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ABSTRACT

This report presents the findings from a 30-month evaluation of the Job Training Partnership Act (JTPA) Title IV Section 401 Indian and Native American (INA) Program. This specially targeted JTPA program provides employment and training services to American Indians, Alaska Natives, and Native Hawaiians. Most grantees are tribal governments or community-based organizations. The evaluation consisted of a survey completed by 113 of the approximately 175 INA grantees and site visits to 23 randomly selected grantees during which services were observed and staff and program participants were interviewed. Following an executive summary and an introductory chapter, the study design is detailed in chapter 2. Chapter 3 presents quantitative data from the grantee survey. Chapter 4 takes a broad-brush look at grantee organizations and service strategies, including goals and objectives, funding, staffing, and service emphases. Chapter 5 looks in depth at specific elements of service delivery: outreach and recruitment, the processes by which participants' needs are assessed and their service strategies developed; and the use of supportive services and stipends to support participants through training. The next four chapters focus on basic and occupational skills classroom training, on-the-job training, work experience and community service employment, and training assistance and placement services. Chapters 10-11 present factors influencing program design decisions, an assessment of program effectiveness, and some policy recommendations. Three appendices contain the survey, client characteristics and outcomes, and a list of abbreviations. (TD)

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SOCIAL POLICY RESEARCH ASSOCIATES

An Evaluation of the JTPA Section 401 Indian and Native American Program

Final Report
January 1999

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EXECUTIVE SUMMARY

This report presents the findings from a three-year study of the JTPA Title IV Section 401 Indian and Native American (INA) Program. The program is designed to deliver employment and training services to Indians and Native Americans throughout the nation, through a network of grantees that includes tribal governments and other Indian organizations. The study was designed to examine the goals and objectives programs have established for themselves, the service design decisions that resulted, constraints and challenges in implementation, and the overall quality and effectiveness of the services in meeting the needs of participants and communities.

BACKGROUND OF THE EVALUATION

The very unique historical, socio-economic, and cultural context of Native American communities has provided ample justification for a specially-targeted program under JTPA, and under JTPA's successor, the recently enacted Workforce Investment Act (WIA) of 1998. These unique circumstances include extraordinarily high rates of joblessness and discrimination directed against Native Americans, even in the face of America's recent robust economy; the importance of tribal sovereignty that should give Native American grantees a greater measure of discretion in running their programs; unique cultural values and a sense of shared identity that provide meaning to Indians' lives; and tribal areas that are often physically remote, with incomplete infrastructures, and very limited labor markets.

In this context, Section 401 of JTPA calls for a specially-targeted program for serving the Indian and Native American population. With annual funding currently at about $50 million, the program serves approximately 19,000 participants each year through a network of about 175 grantees that includes tribal governments, tribal consortia, non-tribal Native American organizations, and, sometimes, agents of state governments. These grantees vary greatly in size and in the contexts in which they operate, and include programs with very limited JTPA funding serving narrowly circumscribed service areas, as well as organizations receiving hundreds of thousands or millions of dollars in annual funding and serving vast sweeping reservations, large metropolitan areas, or even entire states. Taken together, these grantees are responsible for providing services to eligible Indians and Native Americans throughout the United States.

To guide our study of the INA program and provide a framework for the evaluation, we developed a heuristic model of service quality. This model depicts how clients flow through the system and shows the quality indicators for each step in the process. The model suggests that programs need to provide, either directly or through their service providers: effective outreach and recruitment mechanisms, so that all eligible persons who are interested in services can have access (within the constraints of available funding); an initial assessment that is appropriate to the clients' needs and purposes and identifies barriers to successful participation; effective matching to services and case management to ensure that clients are assigned to appropriate services and receive the support they need to see that their service plan is successfully carried out; training that is of the highest quality, including well-specified and individualized learning objectives and contextualized instruction using active learning methods; and training assistance that, to the extent that opportunities in the local area allow, promote high quality job placements and build on skills that were attained. Outcomes need to include, for the participant, the opportunity to learn new skills, improved self-esteem, exposure to the labor market, increased employability, and the advancement of both short-term and longer-term career and other objectives. Community-level outcomes are also of paramount concern to INA grantees, including efforts to improve local services and build capacity for Native American communities and promote a strong sense of culture and community identity.

STUDY DESIGN

The evaluation consisted of two primary components. The first of these was a mail Administrator Survey sent to all grantees. The survey instrument was developed in close consultation with representatives of the grantee community, the U.S. Department of Labor (DOL), and the Office of Management and Budget, and included sections on program goals and objectives; perceived obstacles to obtaining successful outcomes for participants; and an assessment of the nature of relations with the Department of Labor, including grantees' appraisal of the clarity of DOL's guidance, the adequacy of the consultation process and the training and technical assistance that is provided, satisfaction with performance standards and reporting requirements, and so on. Survey administration began in early 1998 and extended through the spring of that year. In addition to asking grantees to provide responses in close-ended categories, we also provided them with the opportunity to write in their thoughts on a wide range of topics. Altogether, we received completed returns from 113 grantees, for a response rate of about 70%. We were gratified to see that almost all respondents took the time to write extensive comments throughout all sections of the survey.

The second and much more elaborate of the evaluation's two components consisted of site visits to 23 randomly selected grantees across the country. The purpose of these case studies was to complement the Administrator Survey by gaining in-depth knowledge about a subset of grantees, understanding the reasons for the service design decisions that were made, identifying constraints and challenges in service delivery, and assessing the quality and responsiveness of the services that were provided. The site visits lasted 2-3 days each and consisted of interviews with program administrators and staff, program participants and recent terminees, and allied community organizations. While on site, field researchers also observed several instances of service delivery (e.g., a classroom or worksite activity) and spoke with those delivering the services (e.g., classroom instructors or worksite supervisors). In selecting the 23 grantees to visit, we developed a stratified random sampling plan that ensured representation of tribal and non-tribal programs, those operating in various regions of the country, large and small programs, and those operating in varying socio-economic contexts.

RESULTS FROM THE ADMINISTRATOR SURVEY

The results from the Administrator Survey are presented in three sections, discussing relationships with the Department of Labor, program goals, and factors affecting clients' success.

Relationships with the Department of Labor

Grantees interact most directly with DOL through DOL's Division of Indian and Native American Programs (DINAP), which provides overall direction and guidance. As part of the Administrator Survey, grantees by overwhelming proportions (over 90%) stated that DINAP clearly communicated program policies while providing enough flexibility for grantees to accomplish their chief objectives. They also gave extremely high marks to the recent partnership initiative instituted by DINAP, finding that it was now a lot easier to "have a say in program policies" and had established an atmosphere of trust and mutual respect. Although the consultation process is thus viewed very favorably overall, a number of respondents suggested that a wider mix of grantees might be invited to participate in various Work Groups and advisory committees.

Among its other duties, DINAP also co-sponsors national and regional training conferences and, through other means, is charged with providing grantees with the technical assistance they need to be effective. Grantees overwhelmingly believe that their training needs are being met through these efforts. The opportunities that grantees have to meet one-on-one with their Federal Representatives are much appreciated, and DINAP staff are widely praised for their helpfulness and timely assistance. The national and regional conferences are similarly viewed very favorably, and the DINAP Bulletins are felt to provide important information. Among vehicles for technical assistance, peer-to-peer exchanges are strongly endorsed.

Despite this very favorable response overall, grantees did make numerous suggestions for how their technical assistance needs could be better met. Suggestions included providing more comprehensive training for new Directors, tailoring workshops at conferences to subsets of grantees (e.g., based on the size of the grant, for reservation vs. urban programs, for more vs. less experienced staff, etc.), providing updated manuals, and improving access to electronic conferencing.

Reporting and performance standards are two vehicles used to ensure accountability. Grantees almost unanimously agree that recent changes to the reporting forms make them easier to use and they believe that the required forms generally cover all information of relevance that needs to be reported. Similarly, DINAP's recent moves to encourage electronic reporting are generally well received, although many grantees are reserving judgement until they see how well the transmission procedures will work in practice. However, an appreciable minority still feel that the reporting forms are too complicated.

Sentiments are more divided on the performance-standards system. Between 70% to 85% of respondents understand the current system of performance accountability and are satisfied with it overall, and believe that it helps them improve their program performance and that the process of adjusting standards is fair. Moreover, two-thirds believe that the current measures of outcomes give enough flexibility for grantees to run their programs as they see fit. At the same time, majorities also feel that the performance-standards system is too complicated, focuses too much on job placements, and does not adequately "reflect the goals of our program."

Thus, although the current system may be something that most grantees can live with and that some even prefer, sentiments are clearly mixed. Accordingly, grantees had numerous suggestions for improving performance measurement, such as that a wider range of outcomes should be covered, that grantees should be able to "claim credit" for services they provided (and not just outcomes), that measures should be developed relating to learning gains for participants who have not yet terminated, and that grantees should be permitted to develop individually-designed performance measures tailored to their own programs. Some of these suggestions are in line with recommendations recently issued by a Work Group convened by DOL to assist in revamping the current performance measurement system.

Program Goals

Section 401 programs operate in extraordinarily difficult circumstances, and grantees find themselves trying to meet the needs of hard-to-serve program participants in often bleak socioeconomic contexts. Given these circumstances, they must balance diverse program objectives, from providing training that boosts long-term employability, to providing a source of income in the short-run, and from meeting the needs of individual participants, to enhancing the well being of the community as a whole.

These diverse objectives were reflected in responses to the Administrator Survey. Respondents nearly unanimously define their objectives as including quite traditional employment and training functions, such as providing participants with training and helping them find jobs and achieve self-sufficiency. But additionally, majorities also rate helping participants with temporary income and supportive needs as important, as well as providing a sense of community. The importance of community as a program objective is especially important for non-tribal programs, presumably because other community agencies serve this function in areas served by tribally-run programs.

Factors Affecting Clients' Success

In recognition of the difficult circumstances within which Section 401 programs operate, we asked grantees to identify factors that made it difficult for clients to achieve successful outcomes. External constraints cited as being most important were the grantees' lack of funding and a lack of adequate job opportunities in the area. Client characteristics that were noted as among the most formidable constraints included participants' lack of work experience, lack of motivation, problems with substance abuse, family responsibilities, lack of awareness of what it takes to get and keep a job, and lack of necessary life skills. Many clients also are strongly tied to their communities, which makes them reluctant to pursue job opportunities that may require relocation.

GRANTEE ORGANIZATION AND SERVICE STRATEGIES

The in-depth case studies also provided the opportunity to look at programs' goals and objectives and service strategies, and to understand how they were devised given the constraints of the local context. A content analysis of grantees' goal statements showed a strong service orientation, in keeping with Native American cultural values that emphasize helping and serving others. Other key themes revealed a strong client-centered orientation that often led to a focus on attending to participants' short-term—to some degree instead of their longer-term—needs. In general, however, goal statements are vaguely worded and lack specificity.

An examination of service designs shows again an emphasis on meeting participants' shorter-term needs. Thus, Training Assistance, which is usually designed for short-term goal attainment, is one of the primary services of choice. Work Experience is another service activity that is very heavily used, and this too often reflects an effort to attend to participants' need for immediate income, as well as to provide services to the community that would otherwise be unaffordable. At the same time, service activities with longer-term training objectives were also a key part of the service mix in many programs, including occupational-skills classroom training, on-the-job training, and basic skills classroom training.

Key factors influencing the service designs that individual grantees chose included the lack of job opportunities in many areas, which often led to a reliance on Work Experience and Community Service Employment; weak relationships in some cases with the private sector, due to employers' overt racism or their poor appreciation of Native American cultures, which limited the use of OJT and restricted the range of suitable job placements; the vast geographic scope of many service areas, coupled with limited transportation networks, which minimized access to training providers and job opportunities; and limited and inadequate funding, which fostered a reliance on less expensive interventions.

Limited funding, while thus circumscribing service options to a very real degree, nonetheless also added as a strong impetus for grantees' efforts to link and coordinate with a variety of alternative agencies and funding streams. Indeed, many grantees have for many years made strong efforts to develop a "one-stop" approach to services, and some have been quite successful in doing so. The specific form these efforts take varies, however. Thus, tribal programs are quite successful at accessing tribal funds or linking with other tribal agencies or programs specially targeted for Native Americans, but often shy away from forging strong linkages with state social service agencies for fear of compromising their tribal sovereignty. By contrast, non-tribal programs are much more likely to link with state agencies and do so quite successfully. Regardless, INA programs in our study have overall done a remarkable job of identifying an array of resources in their communities and accessing them to better meet the needs of their clients.

With respect to staffing, research team members were profoundly impressed with the strong dedication and commitment found among most practitioners. In general, grantee staff were also seasoned veterans, well aware of their communities' needs and available resources. However, some programs have experienced rapid staff turnover. Although new hires can often invigorate a program by bringing an infusion of new ideas, a lack of experience and institutional knowledge can sometimes be a hindrance to effective services.

In any case, grantee staff uniformly understand the fundamental need for "Indian people to help other Indian people" and are strongly motivated along these lines. By the same token, the participants with whom we spoke expressed a strong preference for receiving services from Indian organizations, and indeed many would have avoided seeking assistance otherwise, however dire their needs. This fact suggests the crucial role that Section 401 programs play, especially in urban areas, of fostering community and serving as a critical lifeline for those in alienating surroundings.

SERVICE DELIVERY

In examining the ways in which services were delivered in the 23 case-study grantees, we focused on services in support of training, basic skills and occupational skills classroom training, work experience and community service employment, and training assistance and placement services.

Services in Support of Training

Under this topic we considered the ways in which grantees targeted participants for services and carried out outreach and recruitment, conducted assessment and service planning, performed case management functions, and provided participants with stipends and supportive services.

With respect to targeting and recruitment, most grantees avoid establishing specific targeting goals because they felt that all eligible INA applicants could be considered hard to serve and in need of assistance. For these reasons, grantees were reluctant to give priority to some individuals over others. In cases where targeting was an explicit goal, grantees focused on segments of the population deemed "most in need" by developing specific recruitment procedures, such as implementing a "no-repeaters" policy. While case study grantees reported little difficulty in meeting their enrollment goals, most relied heavily on indirect recruitment methods, such as word-of-mouth referrals or referrals from other agencies, although more proactive methods (e.g., advertisements, announcements at community events, job fairs, etc.) were also sometimes used. In some cases, an over-reliance on word-of-mouth referrals led to inadvertent targeting, whereby individuals with well-developed networks in the community could readily access services, while others who were not as well connected found out about the program only after an unwelcome delay.

Assessment practices varied widely because of differences in the backgrounds and needs of participants. Thus, participants seeking training to improve their longer-term employability were often assessed carefully, including an examination of their basic skills proficiency, occupational aptitudes and interests, and supportive service needs. Meanwhile, those desiring an immediate job referral were assessed much more quickly and simply. To this degree, most grantees were careful about tailoring assessment activities to individual circumstances. However, even where extensive assessment was conducted, grantees were often constrained in developing fully effective service strategies, because clients often had strong opinions about what services they wanted and needed in the short-run, often to the detriment of their longer-term needs. Typically, therefore, service planning was driven by clients' interests in obtaining immediate employment (subsidized or unsubsidized) and their need for immediate income. Additional constraints included grantees' limited budgets and challenges posed by the service areas, such as the lack of transportation and the limited availability of service providers.

Case management services in general were conducted as one-on-one counseling, though sometimes a team approach was used. In any case, case managers were genuinely caring and dedicated. We found many instances in which case management activities were carefully planned and well executed, and often grantee staff went to extraordinary lengths to ensure that their clients' needs were met. Similarly, some grantees devised strategies that entailed maintaining frequent communication with instructors, worksite supervisors, and other service provider staff to identify clients' needs early and intervene appropriately. However, large case loads caused by limited resources, as well as geographically vast service areas, sometimes made case management difficult. Given these constraints, case managers often targeted their attention on participants facing difficulty or those just starting training, sometimes at the expense of those who appeared to be doing well.

Basic Skills and Occupational Skills Classroom Training

Nearly all programs offered classroom training of some type, but generally the emphasis was on occupational skills classroom training (OSCRT) rather than basic skills classroom training (BSCRT). Indeed, BSCRT was the service activity least common in the case study sample and was a service received by relatively few program participants, despite the fact that high school dropouts and those with low basic skills constitute a sizable part of the INA program's client pool. Part of the reason for the relative inattention given to BSCRT is that grantees often refer those interested in such training to adult basic education or GED programs run by other tribal departments or social service agencies, without enrolling them in JTPA.

The relatively few instances of BSCRT that we were able to study were conducted by the grantee itself, rather than a separate service provider. Computer-aided instruction was common, but some programs used a workbook-exercise format. In either case, diagnostics conducted at the outset identified in which skills the participant was deficient, and instruction was oriented accordingly. Among the clear strengths of the examples we studied, all were open-entry and open-exit and emphasized self-paced learning geared to each student's own areas of skill deficiency.

Weaknesses included the fact that learning was usually decontextualized and opportunities for participatory learning or active learning methods were uncommon. Most importantly, due to limitations of funding, instructors in several of the programs were only available sporadically, so that supervision and mentoring were often not as intensive as would have been desirable. Such a loosely structured instructional format meant that only students who were strongly self-motivated tended to make steady progress. By contrast, in programs with greater structure and where instructors were continuously present and held students to high expectations, success rates were much more impressive.

In contrast to basic skills training, OSCRT was quite prevalent. Providers included state or tribal community colleges, private schools and colleges, and vocational-technical schools. Course offerings at these institutions were broad in scope, encompassing degree and certificate programs in myriad vocational fields, including Food Services, Child Care, Respiratory Therapy, Nursing, Graphic Arts, Welding, Business and Information Processing, and many others. Courses of study ranged from those lasting a few weeks to one or two years. Participants usually had a high school degree or GED at entrance, were generally required to have sound basic skills, and were typically highly motivated; thus they could be considered the cream of the JTPA crop. By implication, few provisions were in place for providing access to OSCRT for those who were less well prepared.

The examples we studied were almost uniformly of high quality. Learning objectives were usually well specified, and curricula were practical, applicable, and focused on the development of specific skills needed in a work setting. Subsidiary instruction often focused on important ancillary skills, such as leadership, diligence, communication and problem-solving skills, and goal setting, and Native American cultural elements were also sometimes a part of the instruction. Active teaching methods and contextual learning were predominant; thus instruction was "hands on" and students were "learning by doing," engaged in projects related to real-world or simulated work settings, and worked in teams with their classmates. Instructors strive to remain current, and designed their courses with employers' needs in mind. They also exhibited high levels of professionalism and competence, and, whether Indian or non-Indian, showed dedication, sensitivity, and a strong caring attitude to program participants.

On-the-Job Training

On-the-job training was used by 14 of our 23 case study grantees, but was used extensively by only a few programs. Surprisingly, tribal grantees were somewhat more likely to make use of OJT than non-tribal programs, and, due to the dearth of private-sector employers, job assignments were often with tribal or other public agencies.

Grantees identified several advantages of OJT, including its potential for leading to long-term employment, providing participants with solid job skills that would be transferable to other work settings, and supporting community economic development in Indian-operated businesses and agencies. However, grantees also noted what they felt to be OJT's drawbacks, including its relatively high cost and the potential for employer abuse, which caused them to limit the extent to which it was used. Moreover, in some communities it was difficult to recruit employers to participate, either because there were few employers in the community to begin with or because of overt or covert racism. Finally, tribal grantees often needed to obtain approval for OJT contracts from tribal officials, and this sometimes led to lengthy delays.

Among grantees who used OJTs, two approaches were common. In the first approach, grantees developed individual OJT assignments with diverse employers, typically for program participants who already had basic work maturity skills, adequate basic skills, and usually some relevant rudimentary job skills and appropriate career interests. In such cases, the specifics of the OJT arrangement needed to be individualized to the employer's and participant's circumstances, including the length of the contract, the participants' working hours, and the training plan; doing so proved to be extremely time consuming but, when well done, led to a high quality training and work assignment.

An alternative approach that some grantees used was to develop multiple OJTs with a few employers or with targeted industries, in some cases to support local economic development initiatives or tribal enterprises (e.g., tourism or gaming). These might take the form of simultaneous group OJT assignments or a steady sequence of individual participants being assigned with the same small number of employers over time. In any case, grantees using this strategy found that a single training plan could be developed as a "template," into which, with only small adaptations, the names of individual participants could be inserted in turn. In this way, substantial efficiencies could be realized. Because multiple OJTs were being developed from the same model, great care was usually taken in ensuring that the template was well developed. At the same time, grantees needed to guard against being overly formulaic or failing to adapt the work assignment to the needs of the individual participants.

Regardless of which approach was being used, high quality OJTs required that grantees work to develop good relationships with employers, be sure that participants were assigned to positions that matched their interests and abilities, work with employers and participants to develop meaningful training plans, adjust the length of the OJT contract to the amount of training to be provided, and monitor worksites to be certain that high quality training actually occurred and that participants were adequately supervised and transitioned to permanent employment. When evaluated against these criteria, we found that the quality of the OJTs we studied was mixed. In many cases, the OJTs were carefully selected and monitored and the grantee took great pains in ensuring that quality training was being provided in skills in which the participant was deficient. In other cases, however, the work assignment was poorly matched to the participants' interests and skills and the training plan amounted to little more than a job description.

Work Experience and Community Service Employment

Work Experience (WEX) and Community Service Employment (CSE) provide opportunities for participants to acquire hands-on work experience and skills training, while also gaining immediate income. In general, WEX is used for entry-level workers, while CSE is used for those with more experience. In some cases, for example, participants start out in WEX but switch to CSE when they have reached WEX's 26-week limit. Beyond these differences, there is substantial overlap between these activities with respect to the types of positions in which participants are placed and the training and community objectives associated with the work assignments.

WEX is among the most commonly used service options and is used by grantees in very diverse ways. Its objectives include providing participants with an introduction to the work world or a specific career, teaching occupational skills, providing immediate income, boosting self-esteem, and facilitating the transition to placement in unsubsidized employment. In some cases, it is used as a stand-alone activity, while elsewhere it is used in conjunction (either sequentially or concurrently) with another service activity, such as classroom training. In some instances, it is used as a short-term or stopgap measure to provide participants with needed income while they undergo job search, complete training, or gain an exposure to the world of work; in other cases, it is used, along with CSE, to provide long-term work assignments for individuals, often up to the allowable time and budget limits. This very diversity is part of the reason for the high frequency of use of subsidized employment in the INA programs we studied. Additionally, this activity often makes the most sense on reservations marked by an absence of economic development and with limited opportunities for unsubsidized employment, where direct placements and OJTs are impractical and classroom training cannot be very easily motivated.

In addition to meeting the needs of the participants for income and training, WEX and CSE are used very explicitly to advance community and tribal interests, especially in the face of such economic conditions. Very commonly, tribal agencies come to depend on subsidized labor provided by the JTPA program to meet their staffing needs, including running tribal government offices. Indian Health Services, tribally run day care centers, and even the JTPA office itself, among others. Subsidized employment thus becomes a way in which the tribe could provide valuable social services to the community that it often could not otherwise afford. In some cases, too, the use of JTPA-funded subsidized employment had become so institutionalized that it was used to screen and train potential new hires when job vacancies for unsubsidized employment in tribal agencies occurred. Thus, tribal members who aspired to full-time permanent employment with the tribe knew that the likeliest bet was to first become a JTPA participant and accept a WEX or CSE assignment.

Given the great variety of ways in which subsidized employment is used and the myriad individual and community objectives that grantees needed to balance, it is difficult to unambiguously identify criteria for high quality program designs. However, grantees did not always ensure that participants' training objectives were well articulated or that they were well matched for the positions in which they were placed, even for WEX and CSE assignments that were of substantial duration. Instead, meeting the community's need for subsidized employment and the participants' needs for immediate income often held sway. In any case, participants clearly appreciated the opportunity to work in an Indian-affiliated agency for and with their own people.

Training Assistance and Placement and Post-Termination Services

Services identified under this heading include career counseling, job development, job search assistance, instruction in pre-employment and work maturity skills, job referral and placement services, and vocational exploration. All grantees provided these services to participants, either as stand-alone activities or in conjunction with other training or subsidized employment, and most participants could be said to have received training assistance (TA) of some sort.

Because TA was such a pervasive activity, facilitating access for participants who were geographically dispersed was a continual challenge. Grantees met this challenge partly by outstationing staff at other tribal agencies; however, due to what was sometimes a reluctance to work too closely with non-Indian agencies, linkages with the local workforce development systems (e.g., One Stop) were rarely very well developed. An additional strategy that is just starting to emerge is promoting self-access services, where (for example) jobs can be searched for electronically; grantees' hesitancy in embracing this approach, however, stems from their reluctance to give up the personalized approach to services that is so much a hallmark of the INA program.

Providing TA in a way that reflects the cultural context and Native American values and customs was a particular strength of the INA programs that we studied. Along these lines, grantees adopted a holistic approach to services and typically placed the family and community at the center of services, rather than just the individual participant. Thus, grantees attended to participants' entire physical and emotional well-being, and not just their needs for career guidance and job placement assistance. Similarly, counseling included attention to the well-being of the family as a whole, including health care needs, emotional attachments, and the like.

As a demonstration of cultural sensitivity, grantees also made a particular effort to cultivate listing of jobs in which Native American participants could feel comfortable. For this reason, grantees often emphasized making job referrals in Indian-owned or operated businesses or agencies. Being referred for employment to a firm that provided a comfortable and welcoming environment was something in which many participants clearly placed great value. At the same time, the focus on providing job referrals sometimes caused programs to neglect developing participants' job search skill, which would promote their longer-term self-sufficiency. Moreover, the emphasis on referrals in Native American businesses sometimes came at the expense of referrals with non-Native American firms that might have paid more or were more conveniently located. Thus, grantees need to balance participants' desire for placements in environments in which they can feel more comfortable with their desire for placements in jobs that pay well, offer the opportunity for advancement, have favorable fringe benefits, and match their career interests. Helping participants adapt to non-Indian work settings, and helping non-Indian employers be more sensitive to the needs of Indian workers, were strategies that some grantees used to better balance these objectives.

FACTORS INFLUENCING SERVICE DESIGNS

A number of factors again and again emerged as key influences on grantees' service designs. These factors include the overall inadequacy of funding, which severely limits the number of persons who can be served, from among the much larger number who are program eligible and in need of assistance. Lack of funding also constrains grantees' decisions about the types of services that participants are provided. Along these lines, recent reductions in JTPA funding have caused many grantees to shift towards lower cost service alternatives, such as Training Assistance, and away from Classroom Training and Work Experience; it has also caused them to limit the amounts of supportive services that are provided.

The absence of job opportunities in many Indian communities was another key constraint on service design and delivery. Without a reasonable prospect for placing many participants in unsubsidized employment, grantees needed to make difficult decisions about how best to use their employment and training funds, and often found that it was difficult to convince participants to undertake long-term skills training. Compounding the dilemma, clients' consistent and clear preferences for remaining within the Indian or tribal community further limited choices. Fortunately, in some tribal settings, the introduction of gaming or other successful economic development efforts have served to open up additional employment opportunities.

In light of these and other constraints, grantees were overall fairly effective. Among the most notable elements was their holistic approach to services and the overwhelming commitment and dedication of program staff.

SUMMARY OBSERVATIONS

At the level of federal oversight and policy, the Department of Labor has over the last several years made enormous strides in forging a strong partnership with the grantee community. Although the degree of cooperation evidenced in the DOL-grantee relationship has waxed and waned over the past decades, a fundamental underlying sense of mistrust, even antagonism, has characterized their interactions. DINAP's outgoing chief, Mr. Thomas Dowd, who is himself a former grantee director, has worked hard to dispel suspicion and forge a constructive dialogue. Although some grantees remain wary, the last several years have as a consequence witnessed a major transformation in the way DINAP is perceived. To an extent unforeseen only a few years ago, grantees now feel a sense of ownership towards "their" program and are working cooperatively with DINAP on all matters affecting program policy. Based on this foundation, the INA program is now well positioned to develop a sound future under the new Workforce Investment Act.

In terms of service design and delivery, this future will doubtless reflect the unique role that INA programs play in the employment and training system and the many special strengths that were in evidence among the programs we studied. To begin with, INA grantees epitomize the holistic approach to services. Programs we studied were inordinately conscious of viewing clients as whole people rather than as instances of symptoms to be treated. This approach often extended to a consideration of the needs of other members of the participant's family and the ways in which family dynamics needed to be taken into account to promote the individual's own success.

The notion of holistic services was expanded as well to the conceptualization of the grantee community as a constituency in its own right and as an important beneficiary of the services that were being provided to individuals. Thus, grantees sometimes needed to strike a balance between deciding how to meet the needs of individuals for employment and training assistance while ensuring that the community's own larger interests were being advanced as well. The ways in which Work Experience and Community Service Employment are used clearly exemplify this.

The importance of community surfaced in another way as well, particularly for programs operating away from a tribal setting. In such environments, participants (and potential participants) often feel estranged and alienated from the mainstream culture and look to the organization operating the Section 401 grant as providing a needed sense of belonging. Moreover, participants take great comfort in knowing that their needs for assistance can be met by program staff that share a common ethnic identity as Native Americans and are sensitive to tribal cultures. So important is this shared identity that many participants would not avail themselves of similar services that might be made available from a non-Native American organization.

For their part, grantees, again particularly those in non-tribal settings, become a focal point for community identity. As such—and, again, reflecting their holistic approach to services and their focus on meeting individual as well as community needs—they use funds from a variety of sources to organize cultural activities and events, promote native arts and crafts, run programs for senior citizens, operate Food Banks for the needy, publish community newsletters, and the like. The strong sense of community engendered by these efforts is largely irreplaceable and constitutes one of the strongest aspects of the uniqueness of the INA program. Although many of these subsidiary efforts rely on non-401 funds and a strong spirit of volunteerism, the JTPA allocation constitutes the bedrock of grantees' funding and thus must be viewed as the foundation of these myriad efforts.

Grantees operating in tribal settings, by contrast, to a lesser degree serve as the community's focal point, because other tribal agencies and institutions can play this role. Instead, the JTPA program must be viewed as constituting an integral cog in a wider network of services developed from other funding streams, used in tandem to meet the needs of individuals and the community.

The above considerations suggest the importance of evaluating the INA program in context. The importance of context is suggested as well by the fact that grantees are operating their programs in extraordinarily diverse and often extremely difficult circumstances, typically with very limited funding. For example, service areas in many instances are marked by high rates of joblessness, physical isolation, and extreme economic deprivation. Fashioning an employment and training program in such circumstances poses special challenges and gives rise to difficult decisions regarding how a job training program should focus its energies in the face of a dearth of unsubsidized job opportunities of any kind.

The importance of context suggests that it is very difficult to analyze specific aspects the Section 401 program (such as specific training activities) in isolation. In a real sense, in fact, the value of the program is much greater than the sum of its component parts. Thus, specific activities or services, when viewed in isolation, often seem unexceptional, but the INA programs taken as a whole play a critical role in promoting the vitality and well being of Indian and Native American individuals and communities.

RECOMMENDATIONS

Based on our intensive examination, we are convinced of the critical role that the INA program plays for the people and communities that they serve. We applaud the efforts of those grantees who design and deliver quality services in the face of inordinately difficult challenges.

At the same time, we have drawn on our study's findings to formulate a number of recommendations, which we have formulated at the level of federal policy and practice and the level of the grantee service design and delivery.

Federal Policy and Practice

1. *DOL must take seriously, as it has begun to do over the last several years, its obligation to work in partnership with the grantee community.* Recent initiatives undertaken by the Division of Indian and Native American Programs (DINAP), in conjunction with the Division of Performance Management's Office of Policy and Research (OPR), have been successful in enabling grantees to feel ownership of their program. DOL and grantees are now negotiating in a spirit of openness and cooperation to make important decisions about the program's operation and future

direction. Given that Mr. Dowd recently stepped aside as the Chief of DINAP, DOL needs to ensure that his successor is as committed to dialogue and partnership as he was. The initiatives that Dowd began should not be allowed to falter.

2. *DOL needs to ensure that all grantees have the opportunity to participate in the partnership initiative.* Results from our Administrator Survey suggest that some grantees, while applauding the partnership initiative, feel that they have not had full opportunity to participate. Although Work Groups and advisory bodies can understandably include just handfuls of members, DOL should ensure that all grantees have ample opportunity to express their opinions on matters affecting the program. Where it would not be too disruptive, Work Group or partnership bodies should include provisions for rotating memberships, and efforts need to be made to see that all grantees, including tribal and non-tribal programs and those that are large and small, are well represented. DOL's recent initiative to promote Internet access for all grantees may provide an additional vehicle for giving all grantees the chance to participate in a dialogue.

3. *DOL needs to work with grantees to ensure that new regulations for the Section 401 program are clear, concise, and grant ample flexibility to grantees to design and operate their programs in accordance with the needs of their communities.* The recently enacted Workforce Investment Act (WIA) of 1998 supplants JTPA, but still allows a provision for a separate, national Indian and Native American Program. Doubtless, DINAP will need to craft new regulations for the program under WIA. In keeping with recommendations expressed above, new regulations should be developed with the full cooperation of the grantee partners. In recognition of the great diversity of contexts within which the INA program operates, we recommend that these regulations permit ample flexibility to grantees for designing programs that are responsive to local needs. Overly restrictive provisions on service designs that are not statutorily mandated should be avoided. Any new regulations, as well as all other DOL issuances (e.g., DINAP Bulletins), should also be written with any eye to simplicity and clarity.

4. *The new regulations need to permit WIA funds to be used to promote diverse individual and community needs, including economic development if possible.* Lack of adequate job opportunities and weak economies are among the biggest obstacles Section 401 grantees face in accomplishing their program objectives. Given these circumstances, concerted efforts should be made to spur economic development in Native American communities. The JTPA Amendments of 1992 placed severe restrictions on the use of JTPA funds for economic development activities, effectively eliminating a promising Community Benefits Projects (CBP) initiative that had previously been permitted in the INA program.[1] To the extent that it is allowable under WIA, we encourage DOL to consider reinstating provisions for

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[1] The provisions of CBP allowed grantees to use a limited amount of their JTPA funds to engage in workforce development and training in the context of promoting local economic development.

Community Benefits Projects, or similar initiatives to allow WIA funds to be used to promote, or in conjunction with, economic development efforts.

5. *DOL should forge ahead with plans to revamp the performance standards system for the INA program, to reflect the wide diversity of grantees' circumstances and accomplishments. At the same time, it must be careful to ensure adequate accountability at the national level.* Grantees are clearly ambivalent about the current performance measurement system. Although the current measures are generally perceived as being reasonable and fair, many grantees also feel these measures do not fully reflect their programs' chief accomplishments. Thus, DOL's recent efforts to work in partnership with the grantee community to develop a revised performance-standards system seem wholly appropriate. The recent enactment of the Workforce Investment Act should not delay these efforts.

   The twin themes of this new legislation are, on the one hand, to devolve substantial authority for decision-making to local programs, and, on the other, to ensure that local programs are held strictly accountable for their performance. In keeping with these themes, DOL needs to ensure that new performance measures (as well as program regulations in general) impart substantial flexibility, while at the same time ensuring that adequate accountability mechanisms are in place. This will require that any new performance-standards system provide meaningful and substantial measures of accountability. Additionally, the new measures need to be supported by an adequate reporting vehicle that includes clear definitions of key terms and the valid and reliable measurement and reporting of key concepts.

6. *DOL needs to ensure that additional attention is paid to the needs of grantees for technical assistance and training, especially those who are new Directors, and that grantees have adequate opportunity to engage in dialogue with their peers and DINAP's Federal Representatives.* Any new flexibility imparted under WIA implies as well that grantees be provided with sufficient opportunities to learn how to take advantage of that flexibility by designing effective and innovative services. Along these lines, although the technical assistance and training (TAT) that has been provided heretofore has been adequate overall, certain segments of the grantee population, especially new Directors, need additional assistance.

   In general, capacity building also needs to be promoted, and grantee staff should have the opportunity to build their skills in all areas. Assessment is a particular area in which programs might benefit from additional capacity in the years ahead. Participants will increasingly need to improve their skills to compete in the labor market; schools' and employers' expectations and requirements have risen over the past decade and will continue to place more importance on excellent academic and workplace skills into the next century. In this context, a careful assessment should be the foundation upon which participants' services are based. Without a thorough knowledge of participants' interests and abilities, service plans can be made based only on a general feeling for the clients' capabilities and long-term needs, and thus risk missing the mark. Given this, staff will need to have training on how best to access assessment results and how to interpret them.

Grantees could also benefit from additional efforts to learn about what their colleagues are doing, including through peer-to-peer exchanges. DOL should also continue its recent efforts to ensure that grantees have adequate opportunity to meet individually with DINAP's Federal Representatives.

Grantee Service Design and Delivery

7. *To ensure a more equitable access to services, grantees should avoid an over-reliance on word-of-mouth referrals. For the same reason, they need to make provisions for reaching potential applicants throughout their service areas, through outstationing staff and forging partnerships with other social service agencies.* Outreach and recruitment efforts currently being undertaken are clearly adequate for ensuring a constant flow of participants. However, some grantees rely almost exclusively on indirect recruitment methods, especially word-of-mouth referrals, and this has sometimes made it difficult for potential applicants who are less well connected in the community to be made aware of services. Thus, some participants with whom we spoke, who eventually heard about the program through a friend or relative, told us that they wished they had learned of the program's existence years earlier.

   An additional difficulty that grantees experience in ensuring an equitable access to services is in reaching potential participants throughout the entirety of the grantees' service areas. Achieving this objective is an especially difficult challenge for those grantees serving physically vast territories but who find it financially infeasible to establish separate field offices, due to their very limited funding. In such cases, grantees can follow the lead of many of their colleagues who outstation staff, use roving recruiters, and develop effective joint referral linkages with other social service and tribal programs. As the new WIA legislation takes hold, linkages with the nation's emerging One-Stop systems can be an especially promising practice that is rife with opportunity, as a few grantees have already demonstrated. Thus far such linkages appear to be much underutilized.

8. *While grantees need to attend to participants' immediate needs for income and employment, they need to address clients' longer-term needs as well.* We found that clients often had strong opinions about what services they wanted and needed in the short-run, typically including obtaining immediate employment (subsidized or unsubsidized), driven by their need for immediate income. Consequently, Section 401 grantees often emphasized addressing participants' shorter-term needs, sometimes to the neglect of their longer term needs, and resulting in quick-fix solutions and a "revolving door" approach to services. We recognize that grantees often find themselves severely constrained by limited budgets and other factors. We also appreciate that they must be responsive to the expressed preferences of their clients. To the fullest extent possible, however, grantees should promote long-term solutions and structure service strategies to advance participants' longer-term interests while attempting to address their needs in the short run. Suggestions for how to do so are embedded in some of the recommendations that follow.

9. *Grantees who are not located in reasonable proximity to service providers for Classroom Training should consider utilizing distance learning or alternative delivery vehicles.* Extreme physical isolation is a major impediment to making the full-range of classroom training services available to participants, at least among some grantees. Alternative or innovative service delivery vehicles can be pursued in these circumstances, including distance learning or other on-line classroom services. The greater access to technology among both grantees and participants will make this more and more feasible.

10. *Grantees need to ensure that On-the-Job Training is accompanied by a clear training plan, specifying the specific skills the participant is expected to learn, and in fact provides training opportunities commensurate with the employers' wage reimbursements.* On-the-job training (OJT) has great potential as a service activity in imparting meaningful skill gains and leading to permanent employment, and to this degree can clearly be said to address participants' longer-term, as well as short-term, needs. However, to realize this potential to the fullest, grantees must ensure that the participant's training plan is clearly specified, that the work assignment imparts meaningful skills that are transferable across employers, and that the employer provides adequate supervision and mentoring. Moreover, grantees should have the expectation that employers will continue to hire the trainee once the training period has ended, and limit their involvement with employers who fail to do so. Many of the OJTs we studied exemplified these characteristics, but many others did not. Grantees should ensure that all OJTs attempt to promote high-quality design principles.

11. *Work Experience assignments of substantial duration should also be structured to provide real and meaningful training.* Work Experience (WEX) serves very diverse objectives and is used by grantees in very different ways. In some cases, WEX is deliberately and appropriately structured as a short-term or stopgap work assignment, as when participants are given short-term WEX positions while undergoing job search or as a way of providing exposure to the world of work and boosting self-esteem. Very often, however, WEX assignments are of substantial duration (e.g., up to the 6-month limit). In these cases, grantees should ensure that training objectives are clearly specified and the participants' are learning valuable occupational skills. By doing so, grantees can again promote participants' long-term needs for quality skill development, as well as their short-term need for immediate income.

12. *For participants interested simply in direct placement assistance, grantees need to ensure that they provide not only job referrals, but also that they build participants' job search skills.* Section 401 grantees very appropriately often provide direct placement assistance. In doing so, they should avoid simply giving job referrals, especially when participants seem to lack good job search skills. In such cases, grantees that provide training in job search skills boost participants' self sufficiency and empower them to seek and find their own jobs in the future, minimizing their subsequent need for the program's assistance.

I. INTRODUCTION

This report presents the findings from a 30-month evaluation of the JTPA Title IV Section 401 Indian and Native American (INA) Program. The study has been conducted by Social Policy Research Associates (SPR) and its partner, American Indian Research and Development (AIRD), and was funded by the U.S. Department of Labor (DOL) as part of its broad oversight responsibility for Title IV programs and as a reflection of its commitment to fostering continuous program improvement.

The evaluation consisted of two major components: a qualitative process study and a quantitative analysis of survey and other program data. The qualitative component, on which the bulk of this report is based, draws on site visits made by research staff to 23 randomly selected INA grantees. During these visits, which typically lasted 2 or 3 days each, field staff held discussions with program administrators and staff, classroom instructors and worksite supervisors, and program participants and recent terminees, and they observed instances of training and other services being conducted. The intent of these visits was in no way to monitor the grantees' compliance with regulatory requirements, but was instead to help us understand the goals and objectives programs have established for themselves, the service design decisions that resulted, and the overall quality and effectiveness of those designs in meeting the needs of participants and communities.

Complementing these site visits was the quantitative analysis of data from a variety of sources. Chief among these was a survey administered to all Section 401 grantees, intended to be completed by each program's Executive Director. The survey asked respondents to assess the helpfulness of the support and guidance provided to their programs by DOL, to characterize their program's scope and objectives, and to describe the service planning process and the most important barriers to achieving successful outcomes for participants. A major additional data source was the Annual Status Report, the chief reporting vehicle in the INA program through which grantees provide tallies of the persons they serve, their characteristics, and their outcomes.

ORGANIZATION OF THE REPORT

The remainder of this chapter provides a brief overview of the INA program, focusing on some of the challenges in serving Indians and Native Americans and the ways in which the program has been designed to meet these challenges. By way of establishing the context, it also discusses the unique relationship between the Indian and Native American community and the federal government. The chapter then concludes with an overview of the conceptual model that has guided the evaluation effort, both presenting a heuristic model of service design and delivery and identifying key criteria by which to judge the quality of services.

Chapter II next details the study design, including the manner in which the case study sites were drawn, the protocols for the site visits, the process for designing and administering the survey, and our procedures for soliciting input on the study design and methods from grantee representatives.

Chapter III represents the first analysis chapter, and is drawn exclusively from the grantee survey. This chapter presents tallies from the questionnaire items and quotes extensively from the numerous written comments provided by grantees, on topics that include the respondents' appraisal of the adequacy of the guidance they are receiving from DOL as well as their identification of key elements of their service designs.

Chapter IV, which, like most of the remaining chapters, draws primarily on the results from the site visits, takes a broad-brush look at grantee organizations and service strategies, and includes sections on goals and objectives, funding, staffing, and service emphases.

The next chapter, Chapter V, begins the first of a sequence of chapters looking in-depth at specific elements of service delivery. This chapter concentrates on outreach and recruitment, the processes by which participants' needs are assessed and their service strategies are developed, and the use of supportive services and stipends to support participants through training.

The next four chapters focus in turn on basic skills and occupational skills classroom training, on-the-job training, work experience and community service employment, and training assistance and placement services. Each of these chapters has a similar organization and provides a discussion of the ways in which each service or training type is used and an assessment of the quality of services that are provided.

Finally, Chapter X presents an overview of factors influencing program design decisions, and Chapter XI concludes with an assessment of the programs' overall effectiveness and makes some policy recommendations.

BACKGROUND

Concerned Americans should decry statistics that describe the deplorable socioeconomic, health, and employment conditions of many residents across Indian country. Figures from the 1990 Census and elsewhere show that, by virtually all indicators, many Indian people on and off the reservation suffer from extreme poverty and extraordinarily high rates of unemployment. For example, about 30% of American Indian households, or over twice the national average, have incomes that place them in poverty, and Indian poverty rates in some states and reservations are much higher still. Linked to these poverty rates are high rates of joblessness. In 1995, as estimated by the Bureau of Indian Affairs, the national unemployment rate for Indians in BIA service areas was almost 35%, compared with a national U.S. rate of 5.6%. On some reservations, unemployment has reached catastrophic proportions: Cheyenne River (77%), Fort Totten (59%), Santee Sioux (74%), Fort Sill Apache (80%), and Taos Pueblo (45%). Even off-reservation Indians generally fare poorly in the job market, with unemployment rates well above the national average.

Of course, many tribal communities and Indian people have made tremendous economic progress and achieved high levels of socioeconomic success. But the general lack of a strong economic base in many Indian and Native American communities is indeed persistent and pervasive. Moreover, weak economies have given rise to widespread social and health problems. For example, community health is generally poor and Indian life expectancies are substantially lower than in the U.S. population at large.

Addressing the Need for Employment and Training Services: The INA Section 401 Program

The challenge in redressing these circumstances in light of the very unique historical and cultural context of Native American communities has provided ample justification for a specially-targeted program under JTPA. With these circumstances as a backdrop, Congress established Section 401 of JTPA as a special program providing employment and training services to Indians and Native Americans. Currently funded at about $52 million per year, the program provides services through a network of approximately 175 grantees (with the precise number varying somewhat from year to year). About two-thirds of the grants are run by tribal governments, either singly or as a combination of separate tribes who have entered into a consortium agreement to realize economies of scale. The remaining grantees are non-tribal programs that are generally run by community-based organizations or, sometimes, agents of state governments. Each grantee serves a specified service area, but, in combination, the tribal and non-tribal programs provide services throughout all of the U.S.

Funds are distributed to these grantees using an allocation formula that takes into account the concentration of Indians and Native Americans in poverty and their unemployment rates. DOL uses Census data as the most reliable available source on which to base these calculations. Resulting Section 401 grant awards range from a low of $20,000 annually to more than $7 million. Some grantees additionally receive JTPA Title II-B (Summer Youth) funds (available to tribal programs only), and they may apply for and receive funds from other sources as well, including the Departments of Health and Human Services or Housing and Urban Development, and the Bureau of Indian Affairs. Only the activities provided through the Section 401 program are the immediate focus of our evaluation, although grantees usually attempt to leverage their funds from multiple sources to support their program goals.

Looking at the Section 401 activities, funds were used to provide services in PY 96 to approximately 20,000 participants, about 16,000 of whom "terminated," or left the program, generally after completing their service plan.[1] To meet the INA program's eligibility criteria, participants must be "an Indian, Native Alaskan, or Native Hawaiian, as determined by the ... grantee, who is economically disadvantaged, or unemployed or underemployed.. " or who is otherwise in need of skill upgrading or retraining (20 CFR Part §632.172). Thus, by going beyond the confines of economic disadvantage, the regulations give INA grantees substantially more discretion in who can be served than is typical elsewhere in the JTPA system. Moreover, and reflecting tribal grantees' protection of their prerogatives, past efforts to amend the regulations by requiring targeting on harder-to-serve participants (i.e., those with substantial barriers to employment) were forcefully rebuffed.

In common with most other JTPA programs, participants are offered access to a range of services that include classroom training, on-the-job training, work experience, job search assistance, and counseling and assessment services. Community service employment, unique to the INA program, is also offered.

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[1] See Appendix B for basic information about the program, drawn from recent Annual Status Reports.

Serving the Unique Needs of Indians and Native Americans

INA grantees face constraints common to programs operating under other titles of JTPA. For example, most programs find that federal *allocations are woefully inadequate* for serving all those eligible, and INA grantees are no exception. Indeed, employment and training programs targeted to the Indian and Native American population suffered massive cutbacks during the transition from CETA to JTPA and in recent years have seen their funds dwindle still further. Using available JTPA dollars as effectively as possible is, therefore, a central challenge, as are leveraging funds from other sources and developing coordinated program strategies.

The INA grantees in common with programs operating under other JTPA titles also face the difficult task of addressing the *multiple needs of program participants*. Notwithstanding allegations by some that the JTPA system encourages "creaming," or serving the most job-ready from among those eligible for services, many INA participants are clearly hard to serve and can have their labor market prospects significantly enhanced only with substantial skill upgrading. The further challenge is delivering these services while meeting the need many participants have for an immediate and steady stream of income to support themselves and their families.

Beyond these considerations, however, INA grantees face unique constraints and challenges posed by the special needs of the clientele and the characteristics of their service areas. Some of these are summarized in Table I-1. Leading the list is the virtual *absence of private-sector job opportunities* in many Indian and Native American communities. Of course, some INA programs operate in urban areas or in close proximity to active labor markets. But, as was mentioned earlier in this chapter, joblessness rates on many reservations reach levels that are unheard of in the rest of the nation. In some cases, there are literally no job opportunities of any kind except those few under the control of the tribal government. It is difficult to exaggerate the profound impact this circumstance has, not only to the lives of Indian people, but on the hard programmatic decisions that must by made by JTPA INA program directors.

Closely linked with the lack of job opportunities is the difficulty of providing services in areas that are often *physically remote and with poorly developed infrastructures*. Not only do many Indian and Native American communities lack active labor markets, but they are geographically isolated and thus often not within a reasonable commuting distance of job opportunities or even job training service providers.

Table I-1
The Program Environment:
What Makes the INA Program So Different?

Context	Unique Attributes of Grantees
☞ Absence of active labor markets in many areas. ☞ Remote service areas with weak infrastructures in many areas. ☞ Pervasive discrimination against Native Americans. ☞ Participants' sense of alienation and isolation. ☞ Established relationship between participants and staff. ☞ Importance of cultural values. ☞ Importance of tribal sovereignty.	☞ Extreme disparity in the sizes of grantees. ☞ Diversity of grantee types — Tribal government programs — Tribal consortia — Non-tribal programs ☞ Extreme diversity in service area context

Even programs operating in active urban economies must confront *pervasive discrimination* directed against Native Americans, which limits their employment and other opportunities. Additionally, participants in urban communities often experience a *sense of alienation*, caused by their immersion in an environment that seems to many to be foreign, unfriendly, or even hostile. In such circumstances, expanding participants' access to economic opportunities while enhancing feelings of self-worth and providing a socio-psychological anchor must be important objectives.

As part of establishing this anchor, program staff and participants *build on established relationships* that come from being members of the same community. Thus, in contrast to most other employment and training and social service programs, INA grantee staff and program participants typically have a long-standing person-to-person relationship; they and their family members interact directly in daily life: they shop at the same stores, attend the same church, attend community events together, etc.

Consistent with this, an important challenge is providing for participants' employment and training needs while *being responsive to their culture, identity, and* *value systems as tribal members*. Although Native American communities are themselves very diverse in their belief systems, customs, and traditions, INA grantees face the commonality of needing to be responsive to native cultural values. Even the JTPA legislation upholds this, by explicitly drawing attention to the need for programs to provide services "consistent with (the) goals and lifestyles" of native peoples (Section §401.a.3). After a century of yo-yoing between an effort to uphold the government's trust responsibility and abandoning this responsibility in the name of assimilation, federal policy, at least in principal, is now recognizing the right of Indian communities to maintain their uniqueness.

Moreover, the grantee community is vociferous in its defense of the *prerogatives of tribal sovereignty and Indian self-determination*. This means, from their perspective, that they should be given wide latitude in making decisions about running their programs and that all DOL decisions should be issued only after extensive consultation.

Exactly how INA grantees can best carry out the legislation's mandate to provide services consistent with Native American goals and lifestyles is for each community to decide on its own.

The Diversity of Grantee Types

Despite the similar challenges they face, INA grantees are themselves extraordinarily diverse in their operational constraints and organizational contexts. As a result, very different problems loom large for grantees of different types. For example, as mentioned, grantees are *enormously disparate with respect to their size*. Very large and very small grantees face very different constraints and opportunities. Larger organizations, with JTPA funding in the millions, face the management challenges in coordinating a program with dozens of staff members located in multiple field offices spanning an enormous geographic expanse. Very small grantees, by contrast, may operate with just a few staff members who are responsible for all functions related to the JTPA program, including those involving program administration (e.g., overall program operations, fiscal controls, MIS) and training services (e.g., intake worker, counselor and case manager, trainer, job developer). In such cases, programs cannot realize economies of scale and it is difficult for them to develop a broad array of training options for participants. Leveraging and coordinating services become all the more important. Discussions initiated by DOL early in this decade encouraging those with very small allocations into consortia agreements to realize economies of scale were hotly protested by the grantee community as an infringement on their sovereignty

Grantees also face different challenges according to *differences in their organization type*. Many grantees are run by tribal governments, who need to manage their JTPA funds in the context of the tribal political structure and, oftentimes, in the maelstroms of tribal politics. Others are run by tribal consortia, who need to develop consensus and coordination with multiple tribes, each of which values their autonomy. Finally, others are non-tribal programs, who face the challenge of promoting their participants' Indian identity in the face of an alienating culture.

Programs, too, are *diverse with respect to the socioeconomic contexts* in which they operate. As was already mentioned, many programs operate on remote reservations or rural areas with a very limited private sector; developing job opportunities in such a setting as well as accessing appropriate training services for participants will be enormously challenging. Grantees operating in urban areas, by contrast, may find that job opportunities are more plentiful, but there is more of a need to attend to the participants' cultural isolation and the discrimination they may encounter.

These constraints and considerations pose formidable obstacles to effective program design and implementation. Understanding how grantees face these very different challenges has been an important topic for the evaluation.

The Federal Role

In contrast to most programs funded under JTPA, the INA program is nationally administered. The Department of Labor's Division of Indian and Native American Programs (DINAP) is charged with providing general program guidance and monitoring program performance. Among the ways it carries out these functions is by having a strong hand in crafting program regulations and by issuing periodic bulletins, which clarify matters of policy. It also participates in organizing regional and national technical assistance and training conferences, where grantee staff can receive further guidance on matters of policy as well as attend workshops to enhance their program management and service delivery skills. Further, DINAP Federal Representatives provide broad oversight of grantee operations and are available to confer with grantee staff on issues of concern.

Another way in which DOL shapes program priorities is by issuing performance standards. Required by the JTPA legislation, performance standards in the INA program are issued to each grantee and are outcome based, relating to the kinds of achievements attained by participants who received services and who terminate from the program. Currently, three performance standards are in use:

- The entered employment rate (EER), defined as the number of participants who enter unsubsidized employment at termination, as a percentage of all terminees.
- The employability enhancement rate (EEN), defined as the number of participants who attain an employability enhancement at termination, as a percentage of all terminees. Enhancements, which are taken to represent skill upgrades, are defined to occur for participants who:
    - Enter non-Section-401 training.
    - Return to school or remain in school.
    - Complete a major level of education.
    - Complete worksite training objectives.
    - Attain a basic or occupational skill proficiency.
- The positive termination rate (PTR), defined as the number of terminees who either enter unsubsidized employment or attain an enhancement (or both), as a percentage of all terminees.

Grantees are required to meet their minimum standards on at least 2 of the 3 outcomes, or risk sanction. Minimum standards on EEN are set at a flat rate for all grantees, but those for EER and PTR are established for each grantee after taking into account the characteristics of its terminees and of its service area; in general, grantees serving a harder-to-serve clientele or operating in more economically depressed areas are assigned somewhat easier standards in recognition of the more difficult circumstances within which they are operating.

In carrying out its responsibilities, DINAP, and DOL more generally, has not always had a harmonious relationship with the grantee community. Although the specific issues over which conflict has developed have changed, and the extent of the friction has waxed and waned, two key themes seem to continually resurface:

- The nature of the consultative process. From the grantees' point of view, DOL's efforts in past years to engage in dialogue with the grantees before making policy decisions have been found sorely lacking.

- The appropriate balance between deference to grantees' autonomy, on the one hand, and DOL's oversight responsibilities on the other. Clearly, the government-to-government relations between Indian tribes and the federal government serve to uniquely frame the DOL-grantee relationship.

Recognizing how much conflicts over these issues have hampered its effectiveness in working with the grantees, DINAP has recently undertaken a partnership initiative, which has entailed revisiting a number of policy-related issues—including the program's regulations, reporting requirements, and performance standards—in close consultation with representatives from the grantee community. This initiative has gone a long way towards dispelling grantees' feelings of mistrust that had accumulated over the years, and has been viewed as ushering in a new spirit of cooperation and collaboration between the department and the grantee community.

The Special Relationship with the Federal Government

The importance of cooperation and collaboration is underscored by the "special relationship" between American Indian tribes and the federal government. This context is so important to a proper understanding of the dynamics between DOL and the grantees that a brief discussion of it is in order here. The intent is not to provide a technical or comprehensive historical treatise, but a simple overview that puts in context the condition of Indian affairs in the United States and their relationship to the federal government, the states, and other tribes.

United States taxpayers often assume that American Indian tribal people receive amenities above and beyond those provided to the "regular" American citizen. Some of these assumptions are that Indian citizens: (1) do not pay taxes, (2) all live on reservations, and (3) receive free health care, housing, education, or other social-economic-welfare services. These assumptions are clearly inaccurate. Moreover, whatever tribes and American Indian individuals receive has come at a high price.

Indian-tribal and federal relations formally began with the drafting and signing of the U.S. Constitution. The drafters of the Constitution considered its design after learning of the Iroquois Confederacy, which had held the Iroquois people together for hundreds of years. Ben Franklin wrote in a letter to James Parker:

> It would be a very strange thing, if six Nations of ignorant savages should be capable of forming a Scheme for such a Union, and be able to execute it in such a Manner, as that it has subsisted Ages, and appears indissoluble; and yet that a like Union should be impractical for ten or a Dozen English

> Colonies, to whom it is more necessary, and must be more advantageous; and who cannot be supposed to want an equal understanding of their interests.[2]

The drafters of the Constitution recognized the efficacy of a balance of powers and established Executive, Legislative, and Judicial branches of government, based on a like separation of powers contained in the Iroquois Confederacy. The original U.S. Constitution also twice mentions Indian people (the only mention of another race), as in Article I, Section 2 "...excluding Indians not taxed" and Section 8 "...to regulate commerce with foreign nations, and among the several states, and with the Indian tribes."

The inclusion of Indian tribes in the same category as states implies a status equal to states, and that status is as a sovereign entity. "Indian governments, as sovereign nations existing within the boundaries of the United States, have a special legal and political relationship with the United States. This relationship is defined by treaties and special laws."[3] The U.S. Constitution, once ratified, recognized Indian tribes as sovereign nations; however, most Indian tribes were sovereign before this recognition. Sovereignty may be defined as the supreme power that binds people together to form a nation and from which all other political powers are derived. This supreme power can only be defined by the individual sovereigns. Thus, according to this definition, Indian tribes exercised sovereignty hundreds or thousands of years prior to the United States's recognizing their sovereignty via the Constitution.

Treaties with Indian tribes (1778-1871) were the main vehicle used by the U.S. Government to accomplish several ends: peace, friendship, and trade with independent tribal nations. The U.S. Government assumed a "protective" role but tribes maintained civil and criminal jurisdiction over their lands and the right to self-government. Indian tribes were often forced to cede lands and agree to "peaceful co-existence," and in turn received promises of protection, livestock, farm implements, education, and other provisions that in essence provided for the tribes' well-being in perpetuity "...as long as the grass grows and water flows."

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[2] Benjamin Franklin to James Parker, March 20, 1751, reprinted in *The Papers of Benjamin Franklin*, edited by L.W. Larabee, et al., Vol. 4, pp. 117-21. New Haven, Conn.: Yale University Press, 1961.

[3] Lynn Kirk-Kickingbird, Institution for Developmental Indian Law, Washington D.C.

Acts of Congress, such as the Northwest Ordinance of 1787, further affected tribes and reaffirmed the U.S. government's recognition of tribal sovereignty.

> The Utmost good faith shall always be observed toward the Indians; their land and property shall never be taken from them without their consent; and their property, rights, and liberty never shall be invaded or disturbed unless in just and lawful wars authorized by Congress. . ." (Northwest Ordinance, 1787).

The treaties signed in "utmost good faith" with tribes guaranteed many things; in effect, the U.S. government promised to provide health, education and welfare in perpetuity. The tragedy of the treaty-making is that each of the treaties was broken. Moreover, treaties placed Indian tribes on reservations, where they were expected to become farmers, regardless of their previous lifestyles as hunters or gatherers, and notwithstanding that the reservations were more often than not in arid, less than productive (for farming) land. As a consequence, many tribes were decimated or disrupted and today suffer the consequences, including the lowest income levels, the lowest educational achievement levels (highest dropout rates), the highest suicide rates, the poorest housing conditions, the highest adult and infant mortality, and the highest unemployment rates.

The U.S. federal government, in recognition of the special status of Indian tribes, has passed laws that acknowledge the special rights of Indian tribes and people apart and distinct from other American citizens. Some significant laws specific to Indian tribes are:

- 1778 – First treaty between the United States and Indian Nations (treaty with the Delawares).
- 1787 – Northwest Ordinance – to assure Indian tribal sovereignty and consultation.
- 1790 – Intercourse Act – to strengthen enforcement and prosecution of treaty violations by white traders.
- 1818 – Civilization Act – to provide $10,000 to convert Indians from hunters to agriculturists.
- 1831 – Indian Removal Act – to remove Cherokee, Choctaw, Creek, Chickasaw, and Seminole to Oklahoma from their traditional homelands in North Carolina, South Carolina, Georgia, Florida, and Tennessee. A proposal was developed to form an Indian state.
- 1871 – End of treaty making period.

- 1887 – General Allotment Act – Federal policy to break up reservations.
- 1892 – Commissioner authorized by Congress to withhold food and services to enforce mandatory school attendance, as a means to assimilate Indians into larger American society.
- 1924 – Congress, via the Indian Citizenship Act, grants U.S. citizenship to all Indians. Indian people are tribal citizens as well as U.S. citizens.
- 1928 – Merman Report was issued. The first comprehensive study of the Indian "problem." Basic conclusions were: (1) Indians were getting poor services, in health and education, from public officials charged with meeting these needs, and (2) Indians were being excluded from the management of their own affairs.
- 1934 – Indian Reorganization Act – Congressional attempt to restore tribal governments. Introduced democratically elected officials and tribal constitutions.
- 1934 – Congress passes the Johnson-O'Malley Act, which authorized contracts for welfare and educational services to entice states, territories, and public schools to assume more responsibility for providing elementary and secondary education, medical attention, agricultural assistance, and social welfare for Indian children and adults who reside on Indian reservation lands.
- 1952 – Congress passes a program to relocate Indians from the reservations. This program subsidized Indian individuals to move to urban areas (Los Angeles, Oakland, Kansas City, Dallas, Seattle, Denver, Chicago, etc.) and provided subsistence (food, lodging, and health) for a period of time. Relocated Indians were expected to become "productive citizens" by joining the work force, and some did, resulting in inter-tribal urban Indian populations; others did not "succeed" and returned home to the reservation.
- 1953 – Public Law 83-280, Indian Termination Act. The federal government terminated all services to several tribes, which in effect brought almost total destruction to those tribes and has taken them 40 years to recover.
- 1968 – Kennedy Report is issued, *Indian Education. A National Tragedy. A National Challenge.* This report described the abysmal condition of Indian education and Indian affairs across the U.S. and was the basis for the Indian Education Act of 1972.
- 1970 – President Nixon issues an Indian policy statement:
  "It is long past time that the Indian policies of the Federal government began to recognize and build upon the capacities and insights of the Indian people. Both as a matter of justice and as a matter of

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> enlightened social policy, we must begin to act on the basis of what the Indians themselves have long been telling us. The time has come to break decisively with the past and to create the conditions for a new era in which the Indian future is determined by Indian acts and Indian decisions.[4]

- 1972 – Indian Education Act passed. Reformed the way Indian Education was being conducted by amending the Elementary and Secondary Assistance Act to provide funds for Indian education in schools they attend, mainly public schools, "to meet the academic and cultural related educational needs."
- 1973 – Congress passes the Comprehensive Employment Training Act. Title III, Section 302 established a special program for American Indians and Alaska Natives to provide training and employment to individuals and advance the social and economic development of Indian communities "... consistent with their goals and life styles."
- 1975 – Congress passes Public Law 93-638, the Indian Self-Determination and Education Assistance Act. "638" opens the door of opportunity for Indian tribes to contract programs from the federal government to conduct those programs for themselves.
- 1976 - Indian Healthcare Improvement Act. Provided increased financial resources for services and research in the Indian Health Service.
- 1978 - Indian Child Welfare Act - Allows tribes (in certain instances) to take complete control of Indian children's custody, if the tribe chooses, and control the child's placement in foster care and adoption.
- 1978 - Indian Religious Freedom Act. Provides tribes and Indian people the right to practice all facets of their religion without persecution.
- 1978 – Tribally controlled Community College Act – provides resources for the development of Community Colleges on reservations under the tribes' control.
- 1987 - Indian Tax Status Act - provided the authority for tribes to issue bonds to raise funds for tribal operations.
- 1986 – Indian Alcohol and Substance Abuse Act – provides funds to the Indian Health Service to establish prevention and awareness programs in these areas.

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[4] President Richard M. Nixon in his July 8, 1970 "Message from the President of the United States Transmitting Recommendations for Indian Policy," House of Representatives Doc. No 91-363, 91st Congress.

- 1988 – National Indian Gaming Regulatory Act – provided tribes the opportunity to establish and operate gaming operations with a state compact.
- 1988 – Public Law 93-638 Amendments – provides 10 tribes the opportunity to compact all their federal funds and allocate monies as the tribe chooses.
- 1990 – Indian Law Enforcement Reform Act – created division of law enforcement in BIA and provided financial resources for these programs.
- 1992 – Native American Graves Protection Repatriation Act – allows tribes to recover human remains and objects on federal lands; items on former tribal lands can be reclaimed by tribes.
- 1992 – Indian Employment, Training, and Related Services Demonstration Act (Public Law 102-477) – provides tribes the opportunity to consolidate certain formula-funded grants into a single plan and seek waivers of selected program regulations relating to employment and training programs.
- 1994 – Public Law 93-638 Amendments – provides 30 more tribes the opportunity to compact all their federal funds and allocate monies as the tribe chooses.
- 1998 – Consistent with President Clinton's Executive Memorandum, the Department of Labor establishes as its policy that all dealings with federally-recognized tribes are to be based on government-to-government relationships.

As is evident, American Indian tribes do have a unique relationship in the United States. Their relationship with the federal government is a political relationship based on treaties and the recognition of tribes as sovereign independent nations. The U.S. Constitution reserves for the federal government the authority to make treaties with other nations and forbids the states from doing so, a restriction that many states have attempted to circumvent. For example, the states periodically attempt to assert state jurisdiction over tribes that reside in their state. Tribes resolutely oppose these actions and utilize the American system of justice (federal courts) to maintain their sovereign status. Similarly, when states attempt to levy state taxes on tribal enterprises (e.g., tobacco, etc.), the tribes fight these efforts, and lawsuits reach the Supreme Court annually; each time the tribes' sovereign status has been upheld and the states' petitions are rejected.

Thus, the tribes' special relationship entitles them to concessions by the federal government that are based on treaty rights. Although each treaty has been broken, they are still in effect to this day. Only Congress can abrogate a treaty; the president cannot do so by executive order. Nor can the states impose their jurisdiction on tribes. As one consequence, Indian tribes have suffered under the federal government's whims to make them "productive citizens." Regardless, they have survived and even prospered. The difficult task for all entities involved is how to improve the quality of life of the Native American as a U.S. citizen and a citizen of their tribe.

CONCEPTUAL FRAMEWORK FOR THE EVALUATION

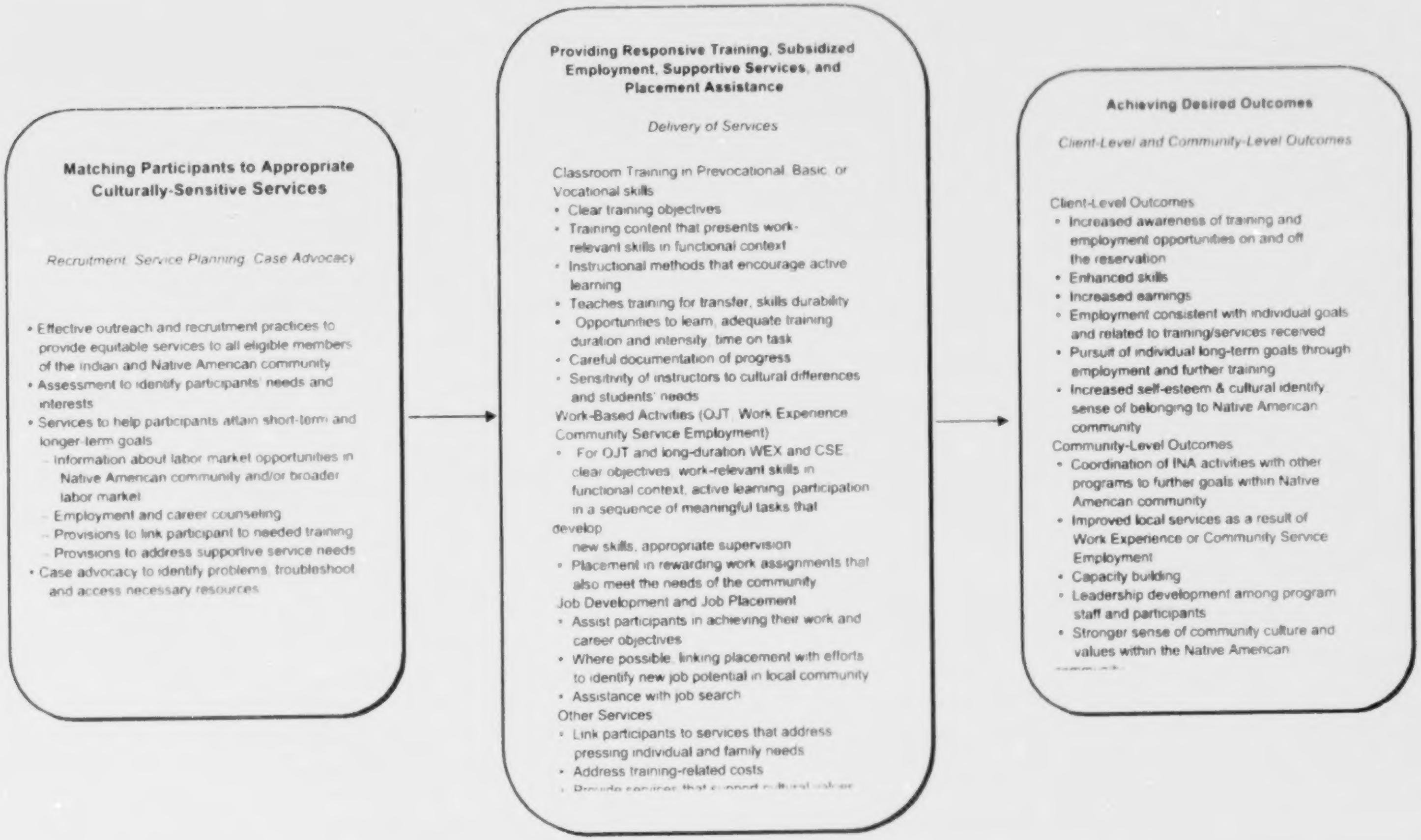
Our technical approach to the evaluation has been guided by two heuristic models. The first is a client-level model, describing the elements of responsive services to INA program participants and the outcomes to which they give rise; the second is a system-level model, depicting the factors that promote or can constrain program quality. These models have guided our exploration of a series of descriptive, explanatory, and evaluative questions about the INA program.

Client-Level Model of Responsive Services

The client-level model of responsive services, presented in Exhibit I-1, is firmly grounded in a conceptualization of high-quality services that draws on extensive research literature. This model depicts how clients flow through the program, the indicators of responsiveness for each phase of the service process, and the intended client-level and community-level outcomes. The model also indicates that the criteria for responsiveness hinge on the individual participant's needs and interests, as well as on the goals grantees have established for their own programs in light of their community's unique needs and circumstances.

Outreach, Recruitment, and Assessment. As indicated in the exhibit, the first step is the effective outreach and recruitment of members of the Indian and Native American community. This includes efforts to ensure that all eligible members of the community have equitable access to services. Once recruited, an assessment of participants' skills, needs, and interests should precede service planning. The comprehensiveness of the assessment is then tailored to what the program and the community can offer the participants in terms of employment and training, as well as to the participant's motivations for entering the program. For example, some participants enter the Section 401 program with objectives that are clearly defined in their own

Exhibit I-1
Client-Level Model of Responsive Services



Matching Participants to Appropriate Culturally-Sensitive Services

Recruitment, Service Planning, Case Advocacy

- Effective outreach and recruitment practices to provide equitable services to all eligible members of the Indian and Native American community
- Assessment to identify participants' needs and interests
- Services to help participants attain short-term and longer-term goals
  - Information about labor market opportunities in Native American community and/or broader labor market
  - Employment and career counseling
  - Provisions to link participant to needed training
  - Provisions to address supportive service needs
- Case advocacy to identify problems, troubleshoot and access necessary resources

Providing Responsive Training, Subsidized Employment, Supportive Services, and Placement Assistance

Delivery of Services

Classroom Training in Prevocational, Basic, or Vocational skills
- Clear training objectives
- Training content that presents work-relevant skills in functional context
- Instructional methods that encourage active learning
- Teaches training for transfer, skills durability
- Opportunities to learn, adequate training duration and intensity, time on task
- Careful documentation of progress
- Sensitivity of instructors to cultural differences and students' needs

Work-Based Activities (OJT, Work Experience, Community Service Employment)
- For OJT and long-duration WEX and CSE, clear objectives, work-relevant skills in functional context, active learning, participation in a sequence of meaningful tasks that develop new skills, appropriate supervision
- Placement in rewarding work assignments that also meet the needs of the community

Job Development and Job Placement
- Assist participants in achieving their work and career objectives
- Where possible, linking placement with efforts to identify new job potential in local community
- Assistance with job search

Other Services
- Link participants to services that address pressing individual and family needs
- Address training-related costs
- Provide services that support cultural values

Achieving Desired Outcomes

Client-Level and Community-Level Outcomes

Client-Level Outcomes
- Increased awareness of training and employment opportunities on and off the reservation
- Enhanced skills
- Increased earnings
- Employment consistent with individual goals and related to training/services received
- Pursuit of individual long-term goals through employment and further training
- Increased self-esteem & cultural identify sense of belonging to Native American community

Community-Level Outcomes
- Coordination of INA activities with other programs to further goals within Native American community
- Improved local services as a result of Work Experience or Community Service Employment
- Capacity building
- Leadership development among program staff and participants
- Stronger sense of community culture and values within the Native American community

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mind and sometimes very narrow in scope. Extensive testing in such circumstances could be viewed as unnecessary and even burdensome. Thus, assessment needs to be appropriate to the circumstances.

Service Planning. The next critical step is to assist the participants in developing an individualized service plan that is tailored to their goals and interests. The role of Indian and Native American programs in service planning includes providing participants with information about the labor market in their immediate communities and in the broader labor market and providing employment and career counseling. Service planning should be a process in which the participant is actively involved, that helps the participant set short-term and longer-term goals, and that is attuned to cultural values and attitudes.

Also as part of service planning, INA programs should be advocates for participants in helping them address skills deficits and in linking them up with needed support services. On the program level, the advocacy includes forming partnerships with service providers, brokering for needed services, and coordinating services to avoid duplication while ensuring the most comprehensive program of services possible. On the individual level, the advocacy should be client-centered and holistic in its approach. To the extent possible, case advocates need to work with each individual to address all needs to meet the participant s goals for program participation.

As shown in the exhibit, the next major step is to provide participants, either directly or through a network of providers, with the services called for in their individual service plans. These services include high-quality and responsive classroom training and worksite activities, job development/job placement, and support services. Participants access these services either singly, sequentially, or concurrently. As part of our conceptual framework, we have operationalized principles of high quality and responsiveness in each of these service areas.

Classroom Training and Worksite Activities. The purpose of classroom and worksite training is to increase participants' knowledge and skills in different areas of need, including pre-vocational as well as basic education and vocational training. Regardless of the type of training, evidence of high quality should include the specification of *clear training objectives*. These objectives need to communicate to participants what is required to be successful in the classroom or on the job and what skills are to be gained after completion. In both classroom training and work-based activities, well-specified training objectives facilitate learning and acquiring skills.

A second criterion of high-quality training is that it *promotes work-relevant skills in a functional context*. Extensive research by cognitive psychologists demonstrates that training in a functional context is likely to be both more effective and more motivating. By teaching skills in an appropriate context, participants can recognize more clearly the importance of the skills they are learning and come to understand that what is learned will transfer to a real-world setting. As the SCANS report emphasizes:

> We believe...that the most effective way of teaching skills is 'in context.' Placing learning objectives within real environments is better than insisting that students first learn in the abstract what they will then be expected to apply. (Secretary's Commission on Achieving Necessary Skills, U.S. Department of Labor, 1991, p 19)

Third, high-quality training programs use instructional methods that encourage *active learning*. Many studies have demonstrated that learning in which participants actively practice a new skill, or think about new information, enables them to acquire the new skill or knowledge more readily than when they are just passively listening or responding in a rote fashion or simply watching a skill being performed. Instructional methods that promote active learning include one-on-one tutoring, role-playing, project-based learning, cooperative learning groups, or supervised practice with instructor feedback. Many of these high-quality instructional practices are highly congruent with the emphases in many Native American cultures on cooperation and working with others.

Fourth, high-quality programs promote *training for transfer and skills durability*. In other words, they not only teach new skills but also teach participants how and when to apply those skills for solving problems. Providing training in a functional context is an excellent way to foster training for transfer. Other training methods that enhance participants' ability to transfer their learned skills to new situations include:

- Demonstrating the skill's effectiveness so that participants realize its benefits.
- Giving participants rules for when a skill should be used.
- Giving participants practice in when to apply specific skills in diverse contexts.

- Training participants to evaluate for themselves whether they are using the skills correctly.
- Continuing training beyond the point of initial mastery of the skill.

Fifth, high quality services provide varied and sufficient *opportunities to learn*. This means that instruction should be of sufficient duration and intensity to teach skills and knowledge. It also requires that participants spend substantial "time on task," learning and practicing skills rather than engaging in irrelevant activities or waiting for further instruction. Finally, opportunities to learn include documenting participants' progress in acquiring skills. These assessments should, ideally, (a) be ongoing and integrated into the instruction, (b) performance-based, using observations of participants' skills in producing actual work products, and (c) involve participants in evaluating their own work and reflecting on their progress.

Sixth, instructors or worksite supervisors should be *sensitive to participants' needs*, motivations, and aspirations, and they should *act as "coaches" or mentors* rather than "directors" of participants' activities.

In general, these principles apply regardless of whether the training occurs in a classroom or at a worksite. However, in some instances subsidized employment (i.e., work experience and community service employment) serves only limited training objectives and is used instead as a short-term or stop-gap assignment for those undergoing job search or who need to test out an occupational area. In these cases, the training objectives and content might understandably be less well developed. In other instances, these activities are used primarily to provide valuable community services. In any case, high-quality subsidized employment needs to provide meaningful work and learning opportunities and be designed to advance community interests. And assignments of long duration should exhibit all the criteria for quality training identified above.

Job Development/Job Placement. Although full-time, meaningful employment is one goal of employment and training programs, it may not be a realistic goal in some INA programs, particularly those in remote rural communities where full-time employment opportunities are virtually non-existent. Nevertheless, to the extent feasible, high-quality, responsive programs will try to assist their participants in obtaining appropriate and meaningful employment, either after training has been completed or as a direct placement (i.e., where participants do not intend to undertake training). Indicators of high-quality and responsive job development and job placement services include those that:

- To the extent feasible allow participants to successfully achieve their work and career objectives.
- Develop jobs that use skills in which participants are being trained, or in the case of direct placements, make use of pre-existing skills.
- Link placement efforts with the identification of potential new jobs in the local community or, if the participant desires, in the broader labor market.

Furthermore, as part of the job development process, responsive INA programs seek to build the economies of communities in which they operate, to provide better opportunities for their people as well as to grow the communities themselves.

Support for Training. Responsive programs also include support services that address the needs of participants as they engage in classroom training, work-based activities, or job search. Services may include help with purchasing tools or equipment needed for the job, family care, health care, personal counseling, nutritional assistance, or transportation assistance. As mentioned above, a holistic approach to case advocacy will help to identify the support service needs of participants that must be addressed if successful outcomes are to be expected.

Outcomes. Finally, the far right box in Exhibit I-1 identifies outcomes that high-quality and responsive programs are intended to achieve. The client-level outcomes include: (a) an increased awareness of employment and training opportunities; (b) enhanced skills that will further long-term employability; (c) increased earnings; (d) where feasible, employment that is consistent with the participant's goals and is related to the training and/or services he or she received; (e) pursuit of longer-term goals through employment or further training; and (f) an increased self-esteem and cultural identity and sense of belonging to the community.

Also important as a goal of many Indian and Native American programs is promoting community economic and social development. Community outcomes include: (a) better coordination of INA activities with other programs; (b) improved local services resulting from community service employment or work experience activities; (c) capacity building for agencies participating in the INA program; (d) leadership development among individual program staff and participants; and (e) a stronger sense of community culture and values.

System-Level Model of Factors Influencing Responsiveness

The system-level model, which is presented in Exhibit I-2, illustrates how client-level services are shaped by the design and operation of the program and how they are influenced in turn by the broader context. The model includes both those actions within the control of the program (at the federal and grantee levels) and those factors outside program control (e.g. local economic conditions, geography, level of needs within the Indian or Native American community)

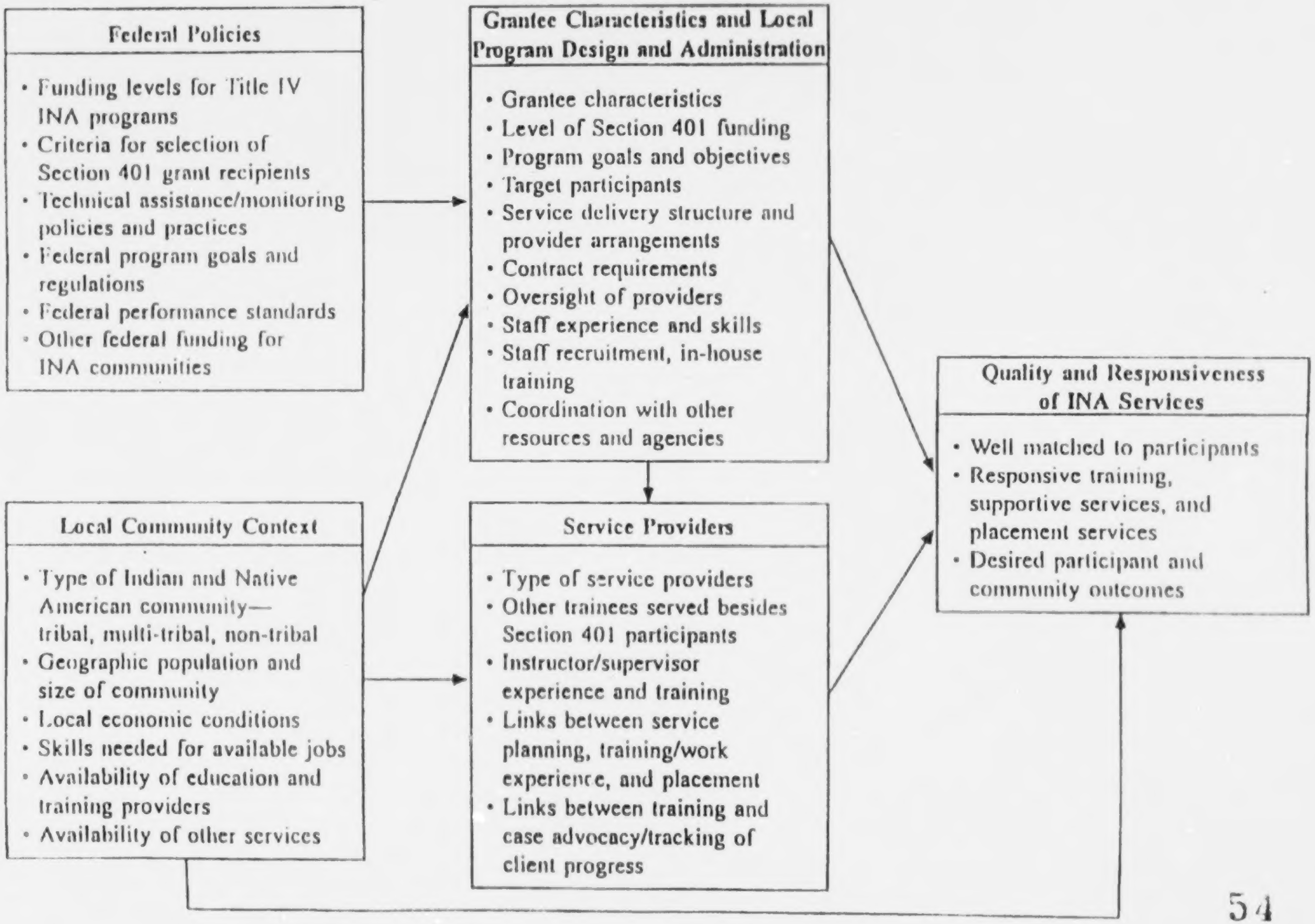
This system-level model has guided the evaluation of factors that influence the quality and responsiveness of INA program services provided to participants. The exhibit illustrates aspects of federal policies and the local environment that can affect an INA program's design, and it shows how design decisions and provider characteristics, in turn, affect the quality of services provided

As shown on the left side of the exhibit, Federal policies and practices are important influences on the services offered through Indian and Native American programs. It is critical to trace through the influence of federal policies to determine whether existing policies have had their intended effects and to identify policies that DOL could adopt to improve services. These factors include: the funding levels provided for the DOL's Title IV INA program; federal technical assistance and monitoring of grantees; federal program goals and regulations, including performance standards; the availability of funds to Indian and Native American communities from other federal programs, such as the U.S. Department of Education, BIA, HUD, and HHS, and special initiatives, such as the consolidation demonstration program administered by BIA (under Public Law 102-477).

The local community context also is important in influencing program design and operations. For example, whether the INA program serves a community consisting of a tribe or multiple tribes or whether the program serves a reservation or a community that is not a reservation can have major impact on service needs and on the resources for providing services. Other local-context factors that are likely to influence how services are delivered and the resources available to provide different services include: the geographic and population size of the community to be served; local economic conditions; skills needed for jobs available in the community as well as in the larger labor market; characteristics of the local population interested in education, training, and/or employment; the availability of education and training providers; and the availability of other services desired and needed by the targeted population.

Exhibit I-2

System-Level Model of Responsive Services for Indian and Native American Program



Federal Policies

- Funding levels for Title IV INA programs
- Criteria for selection of Section 401 grant recipients
- Technical assistance/monitoring policies and practices
- Federal program goals and regulations
- Federal performance standards
- Other federal funding for INA communities

Grantee Characteristics and Local Program Design and Administration

- Grantee characteristics
- Level of Section 401 funding
- Program goals and objectives
- Target participants
- Service delivery structure and provider arrangements
- Contract requirements
- Oversight of providers
- Staff experience and skills
- Staff recruitment, in-house training
- Coordination with other resources and agencies

Local Community Context

- Type of Indian and Native American community—tribal, multi-tribal, non-tribal
- Geographic population and size of community
- Local economic conditions
- Skills needed for available jobs
- Availability of education and training providers
- Availability of other services

Service Providers

- Type of service providers
- Other trainees served besides Section 401 participants
- Instructor/supervisor experience and training
- Links between service planning, training/work experience, and placement
- Links between training and case advocacy/tracking of client progress

Quality and Responsiveness of INA Services

- Well matched to participants
- Responsive training, supportive services, and placement services
- Desired participant and community outcomes

In some of the INA program communities, in particular many of the reservations, the dearth of job opportunities and the lack of appropriate service providers are major influences on the design and delivery of services for participants. The geographical or cultural isolation of some INA communities also exerts an influence on the design and delivery of responsive program services. In many cases, participants from these communities want to remain near their homes despite the lack of job opportunities in the area, and it remains the responsibility of the INA programs to develop as responsive a program of services as is possible under the circumstances. The lack of a well-developed infrastructure in many of these areas, such as a public transportation system that allows for movement within and to and from surrounding areas also largely impacts what an INA program can offer.

Next, the central element in the system-level model is the INA program grantee itself. Influencing factors include grantee characteristics, such as the level of Section 401 funding and the availability of other funding; staff experience and skills; program goals and objectives, including targeted participants and desired outcomes; service strategy, service delivery structure and provider arrangements; contract requirements and oversight of providers; and staff recruitment/training. Among these, a key factor will be the size of the grantee's organization and the corresponding level of Section 401 funding. Annual Section 401 funding to programs ranges from as little as $20,000 to as much as $7 million. Regardless of the needs of participants, such differences dictate varying degrees of ability to provide comprehensive services. The resources available to the programs, and their strategies for dealing with resource constraints (e.g., leveraging and coordination), will thus be important factors.

Moving to the next box in the sequence shown in the exhibit, organizations providing education and training services also obviously affect the types and quality of services provided. Factors that can influence services include: service provider characteristics; instructor/supervisor experience and training; links between service planning, training/work experience, and placement; and links between training and case advocacy/tracking of client progress. The experience that service providers have with providing services to INA participants can affect the quality and responsiveness of the services. In many cases, providers will have other sources of funding, which may make it easier to provide more intensive services than INA program funds alone may allow, but may make the services less responsive to the goals and objectives of the INA program.

The box to the far right of the exhibit includes the criteria for responsive services that we identified in the preceding exhibit. Criteria for high-quality and responsive services include services that are well-matched to the needs and desires of the participants; training, support, and placement services that are responsive to the needs and skills of participants; and services that result in desired participant and community outcomes.

II. DATA COLLECTION

The research design for this evaluation consisted of two primary data collection strategies. The first was a mail survey administered to all Section 401 grantees. This survey served to capture key information from all grantees and to provide each of them an opportunity to provide meaningful input to the evaluation.

The second and much more elaborate of the evaluation's data collection components consisted of in-depth case studies that entailed site visits to a randomly selected sample of 23 INA grantees across the country. These visits each lasted 2-3 days, and consisted of interviews with program administrators and staff, classroom instructors and worksite supervisors, and program participants and recent terminees. While on site, the field researchers also unobtrusively observed training services being provided and reviewed the case files of selected terminees to learn more about the service-planning process.

In developing a strategy to use these data, the evaluation team was assisted throughout by a Technical Work Group, made up of members of the Indian and Native American Employment and Training Council, who volunteered to serve as advisors to the project. The 6 Work Group members gave generously of their time and were asked to provide input on all phases of the evaluation, including the design of the study, the data collection, and the analysis. Their assistance is greatly appreciated.

The remainder of this chapter describes each of the project's two major data collection efforts, beginning with the case studies, and then proceeding to the mail survey.

Design of the Case Studies

The several elements involved in conducting the case studies included: developing the sample, preparing for and conducting the site visits, and preparing write-ups.

Developing the Grantee Sample

Following the terms of our evaluation contract, we were slated to visit 23 grantees as part of this study. In selecting these grantees, we needed to ensure that the final sample would be reflective of the grantee community as a whole as much as possible. This is no small challenge, because, as the preceding chapter has indicated, INA grantees and the communities in which they operate are extraordinarily diverse.

Although every program is in some sense unique, we needed to ensure that the grantees selected for the site visits reflected a broad range of variation on a number of key dimensions. For this reason, we developed a sampling plan that relied on stratified random sampling.

Among the several relevant dimensions on which INA grantees might be stratified for sampling purposes are these:

- **Program size**. INA grantees include many with meager Section 401 funding and others with allocations in the millions of dollars. Similarly, some programs serve handfuls of participants each year, while others serve over 1,000. Obviously this very uneven distribution of resources and scope gives rise to unique challenges for both small and large programs that the evaluation must investigate. For example, looking at the ways in which smaller programs leverage resources from other programs to stretch their job training dollars may provide insights of benefit to the entire JTPA community.
- **Grantee type**. About two-thirds of INA programs are administered by tribal governments, and almost all of the remaining are run by community-based organizations. Implications of operating a program in the context of a tribal government are very different from those facing non-tribal entities. Thus, tribal government status was considered to be an essential dimension for sampling.
- **Community context**. Related to some degree to grantee type, INA programs also vary greatly with respect to the contexts in which they operate. These span the range from sprawling, remote, and economically impoverished reservations, to small pueblo, to vibrant urban and tribal economies.
- **Regional variation.** Each Indian tribe or other organization is to a large degree unique, and any generalization is bound to be noteworthy for the many exceptions to the rule. Nonetheless, some commonalties emerge that relate to regional variation in common histories, tribal cultures and lifestyles, and present-day environments. Typical groupings include the Eastern Woodlands, the Southeast, the Plains, the Great Basin, the Western Plateau, and the Pacific Northwest, among others. Similarly, grantees operating in Oklahoma are unique, because almost all operate as administrative arms of federally-recognized tribes, with a tribal government structure, but without land.

Developing sampling strata that represent the intersection of each of these dimensions is obviously impractical—after all, the cross-tabulation of 4 dimensions with (say) three categories each yields 81 cells. After consultation with the Work

Group, our approach was to adopt a multi-step sampling procedure. First, we excluded from the sampling frame 9 grantees who were operating for the first time in program year (PY) 95, the year our study begin, on the grounds that these grantees would be experiencing the usual problems associated with start-up and, hence, would not be very representative of Section 401 grantees operating as mature programs.

We also excluded grantees who received Section 401 funds but who were participating under Public Law 102-477. This act enables INA grantees to consolidate their funds from various sources into a single service plan, and by waiving certain of the INA program's regulatory requirements, gives them substantial discretion to redesign their programs. Although the investigation of the efficiencies that can be realized by operating consolidated programs under streamlined regulatory requirements would make for a fascinating research endeavor, grantees operating under Public Law 102-477 are not officially under DOL's purview and, hence, these grantees could not be studied under this evaluation. At the time our sample was drawn, 12 grantees receiving Section 401 funds were operating under Public Law 102-477 and, hence, these were excluded from the sampling plan.[1]

After eliminating these two groups of grantees, the remaining grantees were allocated to one of five sampling strata. These were:

- Oklahoma grantees.
- Other (i.e., non Oklahoma) tribal-government programs, whose service area consists mostly of reservation territory; specifically included were those tribal programs with more than 50% of their service area population living on a reservation.
- Other tribal-government programs, whose service area includes reservation but also substantial non-reservation territory; specifically included were those tribal programs with fewer than 50% of their service area population living on a reservation.
- Non-tribal programs operating in large metropolitan areas; specifically included were non-tribal programs with more than 75% of their service area population living in metropolitan areas.

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[1] However, other grantees, including several we did visit, were contemplating operating under Public Law 102-477, and a number have since decided to do so.

- Non-tribal programs operating in rural or small urban areas; specifically included were non-tribal programs with fewer than 75% of their service area population living in metropolitan areas.

Table II-1 shows the number of grantees in each of these strata at the time our sample was drawn, and the amount and percentage of PY 95 Section 401 funding that had been allocated to each.

Table II-1
First-Step Sampling Strata

Category	# of Grantees	PY 95 Allocations	
		Amount	%
1. Oklahoma grantees	20	$6.3	11.3
2. Other tribal programs/high reservation	51	17.0	30.2
3. Other tribal programs/low reservation	36	9.9	17.5
4. Non-tribal programs/high metro	31	11.3	19.9
5. Non-tribal programs/lower metro	28	11.9	21.0

Note: The amount of allocations are shown in millions of dollars and represent the cumulative amount of PY 95 Section 401 funding received by grantees in that stratum, after excluding those participating in Public Law 102-477 or who were new grantees in PY 95

Of the 23 grantees to be included in the sample, we decided in conjunction with members of the Work Group that 21 should be drawn from these 5 strata. Selection was to be conducted randomly proportionate to size, both within and across the strata, with size measured by amounts of PY 95 Section 401 funding. Selection proportionate to size ensures that the resultant sample will be reflective of how the typical Section 401 dollars are being spent. Given selection proportionate to size *across* strata, Table II-2 shows how many of the 21 grantees to be selected at this stage were drawn from each stratum. For example, since 11% of aggregate funds are represented by Oklahoma grantees, 11% of 21, or 2 grantees, should be selected from this stratum. Further, selection proportionate to size *within* strata ensures that larger grantees from within each stratum are more likely to be chosen than smaller ones. Thus, a program that is twice as large as another will have twice the probability of being selected. Finally, the selection algorithm was designed to increase the odds that the several grantees selected from within each stratum would be drawn from different regions of the country.

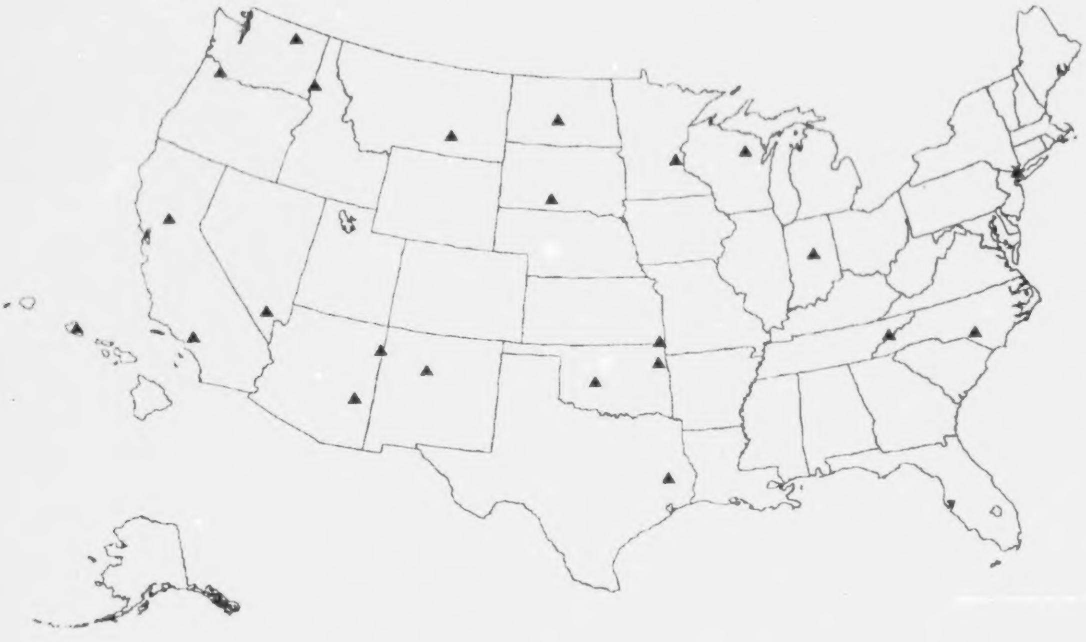
This general scheme should ensure adequate representation of very diverse INA programs, including tribal and non-tribal programs and those operating in very different community contexts. Moreover, selection proportionate to size ensures that the resultant sample will be reflective of how the typical JTPA dollars are spent. However, these procedures were also expected to yield very few instances of programs that are very small, which we will define here as programs with allocations of less than $100,000. About 25% of the INA grantees in the sampling frame (i.e., after excluding new grantees or those participating in Public Law 102-477) are this small, yet their cumulative allocations amount to just $2.6 million, or less than 5% of the total. Thus, if all 23 grantees were chosen proportionate to size from the 5 strata defined above, only 1 grantee would be likely to be very small (or 5% of 23). Understanding the challenges faced by small grantees was felt to be an important objective for the evaluation, especially since about one-quarter of all grantees are within this size classification. Thus, 2 case study sites were reserved for a second-stage selection. For this stage, 2 grantees were randomly selected from among all grantees in the sampling frame with funding of less than $100,000 and that had not been selected in the first stage. These two, when added to the 21 chosen in the first stage, yielded the 23 grantees first selected for the study.

Table II-2
Number of Grantees Selected from Each Stratum in the First Stage

Category	No. of Grantees Selected
1. Oklahoma grantees	2
2. Other tribal programs/high reservation	6
3. Other tribal programs/low reservation	4
4. Non-tribal programs/high metro	4
5. Non-tribal programs/lower metro	5
Total	21

Each of these grantees was contacted by telephone by research staff and was urged to cooperate with the study. The Indian and Native American Employment and Training Council graciously agreed to add their considerable influence also; accordingly, Council members prepared a letter that was sent to each of the selected sites. Perhaps because of this gentle prodding, all programs that had been selected initially agreed to participate. However, as the site visits were being scheduled, one grantee who had been selected kept deferring the date for the visit. Consequently, a replacement grantee was randomly selected from within the same sampling stratum. These 23 constituted the final site visit sample. Figure II-1 pinpoints their location on a map of the United States.

Figure II-1
The Location of Grantees in the Final Site Visit Sample



Note: Symbols on the map represent the location of the central administrative office of each of the grantees selected for the site visit sample.

Characteristics of the Sampled Programs

The sample design described above ensures that the sampled programs will reflect the range of grantee variation on key dimensions. As a way of summarizing the characteristics of the sample, however, Table II-3 presents the distribution of the site visit sample on key contextual attributes in comparison with all grantees taken as a whole. For the comparison, the distributions for all grantees are shown both unweighted and weighted by Section 401 allocations; in other words, the unweighted distribution counts each grantee equally, but the weighted distribution counts each grantee differentially according to the amount of its funding. Since we sampled grantees proportionate to size (with the exception of the two very small grantees selected in the second stage), in general we would expect the distribution of grantees in the sample to match most closely with the distribution for all grantees after they had been weighted.

These results show in fact that the distributions match quite closely on each of the dimensions shown. For example, about 60% of the grantees in our sample are tribal government programs and 40% are non-tribal programs, which matches quite closely with all grantees as a whole. Similarly, the regional distribution shows only minor discrepancies between the various columns.

Differences are somewhat greater for the distribution on Section 401 allocations, but these differences are exactly as expected given the way we drew our sample. The first thing to note is the tremendous differences between the size distribution for all grantees when the sample is unweighted and when it is weighted. This comparison shows dramatically, as we suggested earlier, that INA grantees are enormously diverse with respect to size. For example, about 25% of all grantees have allocations of less than $100,000 per year, but these make up only about 5% of all allocations. Similarly, at the other extreme, only 4% of the grantees have allocations of $1 million or more, but these make up 30% of total allocations.

Because we drew 21 of the 23 grantees in our sample proportionate to their size, in general the distribution of allocations for our sample should match the weighted distribution of all grantees much more closely than the unweighted distribution, and indeed it does. Thus, about 40% of both our sample and the weighted grantee pool have funding from $100,000 to $499,000, about 20% have funding between $500,000 to $999,000, and about 30% have at least $1 million in funding. The biggest discrepancy is in the smallest size classification, and this comes about by design.

Because we deliberately drew the final two grantees for our sample from the smallest size group (in the second-stage selection), we in essence ensured that our sample would "split the difference" when compared with the weighted and unweighted distributions for all grantees.

Table II-3
Contextual Characteristics of Grantees
in the Sample, Compared with All Grantees

	Grantees	All Grantees	
	In Sample	Unweighted	Weighted
Grantee Type			
Tribal	60.6	63.3	57.3
Non-tribal	39.1	36.7	42.7
Census Region			
Northeast	4.3	8.4	5.7
South Atlantic	8.7	7.2	5.9
East North Central	8.7	10.8	7.4
West North Central	13.0	11.4	10.4
South Central	17.4	17.5	17.2
Mountain	26.1	28.3	33.1
Pacific	21.7	16.3	20.3
Section 401 Allocations			
Less than $100,000	13.0	24.7	4.6
$100K to $499K	39.1	57.8	40.6
$500k to $999 million	17.4	13.3	25.6
$1 million or more	30.4	4.2	29.1

Note: Figures represent percentages of grantees in the sample (in the first column) and in the sampling frame as a whole (in the second and third columns). The weighted percentages count each grantee in the sampling frame differentially, depending on the amount of its Section 401 allocation for PY 95. The sampling frame includes all grantees receiving Section 401 funding (at the time our study commenced), excluding those participating in Public Law 102-477 and a number of grantees who had just been newly designated. See text for further details.

We drew on the Annual Status Reports for PY 95 to make additional comparisons between our sample and the larger pool of grantees from which the sample was drawn. These results are shown in Table II-4. As the table shows, the outcomes recorded by grantees in our sample are very close to those posted by all grantees. For example, about one-half of the terminees from each group of grantees enter employment, an equal number attain an employability enhancement, and about 80% achieve a positive termination.

The characteristics of terminees at intake are also very similar across the groups. Across all three groups, females terminees modestly outnumber males, and the age and education distributions are nearly identical. Finally, terminees in each of the groups record barriers to employment in about equal numbers, with appreciable proportions who are single heads of households, have multiple barriers to employment, are long-term unemployed, or receive public assistance.

Thus, based on these tabulations we can conclude that the sampling strategy appears to have been effective in yielding a site-visit sample that reflects the range of variation of the grantee universe as a whole, at least on these key dimension.

Conducting the Site Visits

For each grantee selected for the sample, we conducted intensive on-site visits that lasted 2 or 3 days each, depending on the complexity of the site, as suggested by its amount of Section 401 funding. During each visit, we conducted in-depth conversations with grantee staff and community leaders. At each site, we also selected approximately 2 instances of service activities for detailed study and observation. These activities were selected purposively from among the various services provided by grantees to ensure some variation in activity type, both between and within sites. When pooled across grantees, the number of different instances of each service activity that were selected in this way included:

- Basic skills classroom training: 3 instances
- Occupational skills classroom training: 18 instances
- On-the-job training: 6 instances
- Work experience: 13 instances
- Community service employment: 4 instances

- Training assistance: 4 instances

Table II-4
Characteristics and Outcomes of Terminees Served by Grantees in the Sample, Compared with All Grantees

	Grantees In Sample	All Grantees	
		Unweighted	Weighted
Outcomes			
Entered Employment Rate	51.9	51.9	49.3
Employability Enhancement Rate	50.9	55.0	53.6
Positive Termination Rate	81.9	82.1	81.8
Characteristics of Terminees (%)			
Gender			
Male	41.3	43.4	43.2
Female	58.7	56.6	56.8
Age			
Less than 22	26.3	29.6	28.4
22 to 29	30.3	30.3	30.4
30 to 54	41.2	37.8	39.1
55 or more	2.2	2.3	2.1
Education			
Less than high school	20.3	22.0	21.1
Student	5.2	8.0	8.5
High school graduate	48.6	47.6	45.5
Some college or more	25.9	22.4	24.9
Other Barriers			
Single head of household	27.4	27.4	26.0
Has multiple barriers	38.1	40.3	36.4
Unemployed long term	39.6	44.6	38.1
Public assistance recipient	36.8	34.3	34.6

Note: Data are drawn from the PY 95 Annual Status Reports submitted by each of the grantees and represent grantee averages (i.e., averages of the values reported by each grantee). The columns are defined as specified in Table II-3.

For each activity selected, we observed the service being delivered and spoke with the trainers (e.g., classroom instructors, worksite supervisors, etc.) and participants who were involved.

Specific activities conducted in conjunction with each site visit included:

- Reviews of existing information about the program, such as program plans and budgets, examples of RFPs and service contracts used with service providers, and summary reports on participant and/or terminee characteristics, services provided, and outcomes achieved by participants.
- Detailed discussions with grantee directors and key administrative staff to understand local program goals and objectives and how they were established, how local staff developed a service strategy and designed services to meet those goals, and how service strategies and program operational structures address the needs and values of the Indian and Native American participants and communities.
- Detailed discussions with local community representatives, including tribal officials or community leaders or representatives of other Indian-identified community agencies or organizations, to collect more information about local community needs, how INA programs have addressed those needs, and how the community has benefited from INA program activities.
- Detailed discussions with grantee staff responsible for the delivery of upfront services, including recruitment, service planning, and case management, to understand service choices available to participants and the ability of those services to meet participants' varied needs.
- The in-depth study at each sample grantee of two representative service activities. For the activities selected for detailed study, we conducted:
    - Detailed discussions with provider staff, such as curriculum planners and classroom instructors.
    - Observations of services.
    - Reviews of written curriculum materials.
    - In-person discussions with participants in these services who were present at the time the activity was being observed.

  The purposes of these data collection activities were to describe the objectives for the particular service activity, document the service/training content and instructional or other service methods used to achieve service goals, and assess the quality of services and extent that services were responsive to participants' needs and values and furthered the employment/training objectives established by the grantee.

- The review of existing information in client case files for approximately two to four recent terminees, to assess the nature of assessment, service planning, and case management services received by the individual.[2]
- Individual or small group discussions, conducted either in-person or by telephone, with these terminees to learn of their reactions to and satisfaction with the services they received.

Before conducting the visits, however, we first developed field protocols to guide the on-site data collection. Separate guides were developed for interviews with different respondents and for other on-site data collection activities. Draft data collection protocols were shared with DOL and the Technical Work Group and were refined based on comments we received from them. The development of the guides as a formalized planning step helped to ensure that all project staff agreed about the scope and content of the case study visits. The guides were also to be used as a checklist to ensure that all relevant issues were covered during each site visit. Of course, these guides structured interviews only very loosely; site visit staff were encouraged to develop free-flowing discussions in their interviews and to build on each respondent's special expertise and interests.

Following the completion of each site visit, the field researcher prepared a narrative site visit report that described the results from the site visit activities. These narratives, which were viewed only by SPR and AIRD staff, had three main objectives: descriptive, explanatory, and evaluative. The first objective was to provide basic descriptions of program-level and service-delivery-level objectives, organizational structure, service strategy, and service delivery decisions and procedures, as well as information about the resource and geographic scale of each program and features of the local context that influenced or constrained the choices made by grantees and their service providers.

The second objective was to understand the "how" and "why"—the factors that shaped the organization and service approach observed at each site and that affected the grantee's or provider's ability to provide responsive services. This second level of understanding was essential for identifying intervention points (parts of the system where changes in policy or management might support the improvement of the INA program as a whole or in specific sites), as well as for understanding how strategies for program improvement may differ for grantees facing different external environments or with different internal organizational structures.

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[2] In so far as possible, we tried to ensure that these case files were randomly selected (e.g., by randomly picking names from rosters of recent terminees, or by pulling a case folder from a filing cabinet). In some instances, however, grantees had picked case files for us in an effort to be helpful. Although in even these cases we instructed the grantee staff to select randomly, we had little control over the actual selection.

The third objective was to assess the extent to which the overall program and individual service approach and program operations met the criteria for responsive and high quality services described in the conceptual framework and to identify the strengths and weaknesses and opportunities for program improvement in each local case example.

This Final Report was developed by drawing heavily on these write-ups.

THE MAIL SURVEY

An additional data-collection component was an Administrators Survey, which was to be completed by all Section 401 grantees (except those participating in Public Law 102-477). This survey, along with data drawn from the Annual Status Reports, was intended to provide a baseline of information for all programs that would round out the in-depth site visit information we collected from the sample. The survey was additionally viewed as an opportunity for all grantees to provide input into the evaluation, by allowing them to draw attention to issues that concerned them.

The survey was designed with these specific objectives in mind:

- To assess how satisfied the grantees are with the services and guidance received from the Department of Labor, including those relating to training and technical assistance, performance standards, and reporting.
- To understand program goals and emphases that recipients of Section 401 funds have established for themselves, in relation to organizational structure and context.
- To determine the greatest obstacles the grantees face in obtaining successful outcomes for participants.

An initial draft of the survey was prepared in the fall of 1996 and was submitted to DOL for its review. Shortly thereafter, copies were distributed to members of the Native American Employment and Training Advisory Council during a meeting of the Council held in October of 1996. Later, nearly 100 copies were distributed to members of the grantee community at a regional conference of INA grantees that was held in November 1996 in South Dakota. Finally, members of the Work Group specially designated by the Council to advise the evaluation team reviewed multiple drafts of the survey, beginning in late 1996 and extending into the first few months of 1997.

In all these cases, reviewers were asked to comment on any aspect of the questionnaire, including its clarity and content. In an iterative process, comments from initial rounds of reviews were used to modify the survey before sending it out for additional feedback from others. By the end of March 1997, after the survey had undergone several revisions, a final draft was ready for review by the federal government's Office of Management and the Budget (OMB), whose go-ahead was necessary before the data collection could proceed. OMB had its own comments, and the survey was revised yet another time, before approval was finally given in December of 1997. A copy of the survey is included as Appendix A.

The mail-out then commenced in early January 1998. Each grantee receiving Section 401 funds, except those participating in Public Law 102-477, was mailed a copy of the survey, along with a letter from Mr. Thomas Dowd, Chief of DINAP, encouraging grantees to respond, and a postage-paid business reply envelope. Following our standard procedures for surveys of this sort, we mailed reminder postcards to all non-responding grantees approximately three weeks after the initial mailing, and then mailed out another copy of the questionnaire approximately three weeks after that to those who still hadn't responded. Additionally, several advisory Work Group members publicized the survey in various regional meetings, and Mr. Norm DeWeaver, a Work Group member, gave the survey a plug in his widely disseminated *Friday Report*. In an effort to get still more returns, AIRD and SPR staff telephoned each of the remaining non-respondents to encourage them to reply. These calls generated another batch of returns, before the processing of surveys was finally cut-off, in late May. Table II-5 shows that, in total, 113 of the 165 grantees returned completed surveys, for a very satisfactory final response rate of nearly 70%.

Although a 70% response rate is quite impressive, we still must be concerned that non-respondents would have given different answers than those for whom we do have data. To the extent this is true, our survey findings might not generalize very well to the entire grantee community. The existence of such potential "non-response

Table II-5
Response Rate to the Administrator Survey

	Number	Percent
Returned a completed survey	113	68.5%
Did not return a survey	52	31.5
TOTAL	165	100.0

Note: Figures represent the number and percentage of grantees.

bias" can never be refuted conclusively, because by definition we cannot know how non-respondents would have answered the survey. We can, however, test whether non-respondents are systematically different from respondents on other measured characteristics, such as their tribal status, the size of their funding allocation, the outcomes they record for participants, and so on. If there were such differences, we would at least know what segments of the grantee community were underrepresented by our data; on the other hand, if differences were modest, we would have more confidence that the survey results in fact reflect the sentiments of the grantee community at large.

Table II-6 presents these differences, showing the sampling strata, tribal government status, Census region, funding amounts, and the average outcomes attained by participants, for grantees that did and did not return an Administrator Survey. As the table shows, almost all differences are quite small. In fact, only one difference attains statistical significance at the .10 level. Thus, with this one exception, chance cannot be ruled out as an explanation for the modest difference in characteristics between respondents and non-respondents. For example, tribal programs were about as likely to complete the survey than non-tribals, as were those in various regions of the country, and with different funding amounts. Even outcomes, as reflected in the entered employment rate and employability enhancement rate, are approximately equal between responding and non-responding grantees. The one difference that is significant suggests that non-tribal programs in heavily urban areas were somewhat less likely to complete the survey than were grantees in other strata.

Overall, then, we conclude that no appreciable evidence of response bias is uncovered in these data.

Table II-6
Characteristics of Grantees, by Whether or Not They Completed the Administrator Survey

	Returned a Survey	Did not Return a Survey
Primary Sampling Strata		
Oklahoma grantees	12.1%	10.2%
Other tribal/high reservation	32.7	26.5
Other tribal/low reservation	21.5	20.4
Non-tribal/high metro	15.0*	26.5
Non-tribal/lower metro	18.7	16.3
Grantee Type		
Tribal	65.1	58.8
Non-tribal	34.9	41.2
Census Region		
Northeast	7.3	9.8
East North Central	11.0	7.8
West North Central	12.8	9.8
South Atlantic	8.3	5.9
South Central	18.3	13.7
Mountain	27.5	31.4
Pacific	14.7	21.6
Section 401 Allocations		
Less than $100,000	24.8	27.5
$100K to $249K	35.8	25.5
$250K to $499K	25.7	21.6
$500k to $999 million	11.0	17.6
$1 million or more	2.8	7.8
Outcomes		
Entered Employment Rate	54.9	54.5
Enhancement Rate	57.4	54.6

Note: Figures represent the percentage of grantees with the characteristics in question, except for rows tabulated under Outcomes, which represent the mean entered employment rate and enhancement rate for grantees in the two columns. Significance tests are computed as a comparison of mean differences across columns.

* Statistically significant at the .10 level

** Statistically significant at the .05 level

III. RESULTS FROM THE ADMINISTRATOR SURVEY

Although our site visits provided us with the opportunity to learn in-depth about the service designs of a small number of programs, the Administrator Survey enables us to look more broadly. As noted in the previous chapter, about 70% of all grantees completed the survey, giving us good confidence that the data generated from this source reflect the sentiments of all segments of the grantee community.

In addition to answering the closed-ended questions, grantees who responded to the survey also took the time to provide extensive written comments on a range of topics, including their program goals, their needs for technical assistance, suggestions for improving performance standards, their thoughts on barriers to serving their clients, and so on. In fact, scarcely a dozen of the 113 grantees who returned surveys failed to provide written comments of some sort, and most wrote extensively on multiple topics. We are extremely gratified and grateful that so many grantees took the time to share their thoughts with us. The responses to the close-ended survey questions, as well as these extensive written comments, thus provide a rich source of information about the sentiments of a broad spectrum of the grantee community on a range of topics.

In this chapter, we summarize the survey responses and will quote extensively from the comments the grantees provided, so that grantees can express their thoughts in their own words.[1] We emphasize, though, that *the verbatim grantee comments rightly reflect only the opinions of the grantees who made them and should not be construed as representing the opinions of the grantee community as a whole.*

RELATIONSHIPS WITH THE DEPARTMENT OF LABOR

As part of the Administrator Survey, we asked the grantees an extensive battery of questions about their interactions with DOL, including whether policy guidance was clearly expressed, whether their technical assistance needs were being met, whether reporting requirements were appropriate, whether the consultation process was adequate, whether performance standards captured important dimensions of their performance, and so on. In each of these areas, grantees were asked to respond typically on a 4-point scale, whether they agreed or disagreed with each of various statements; those reluctant to express an opinion had the option of circling "no opinion" as their response.[2] Grantees also had the opportunity to provide written clarification of their response or give additional opinions or express concerns. These findings will be described in this section.

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[1] The comments from the grantees have been slightly edited, to improve clarity (e.g., by eliminating abbreviations, adding articles and connecting words, etc.)

Policy Guidance

Among the most important functions of DOL's Division of Indian and Native American Programs (DINAP) is providing an overall direction to the Section 401 program. In carrying out this responsibility, DINAP, in cooperation with its grantee partners, crafts regulations, issues other guidance, and by its actions in general sets an overall tone that establishes program priorities.

As part of the Administrator Survey, we asked how clearly this program guidance was being communicated and whether it provided sufficient flexibility for grantees to address the needs of their participants. These results, shown in Table III-1, suggest that grantees overwhelmingly believe that policies are being communicated clearly, with just short of half endorsing this sentiment strongly and nearly another half endorsing it somewhat (question 'a' in the Table).

Grantees also feel that policies give them the flexibility they need to get things done. For example, fewer than 10% disagree with the statement that "our program has enough flexibility to address the needs of participants" (question 'b'), with over half agreeing with this statement somewhat and another 38% agreeing strongly.

Regulations are, however, perceived as being somewhat too complex, at least by about 60% of the respondents (question 'c,' in Table III-1). Consequently, it comes as no surprise that efforts currently undertaken by DINAP, as part of the partnership initiative, to revise the regulations by simplifying them are viewed very favorably (question 'd'). Indeed, no statement in the section receives a stronger endorsement, with over two-thirds agreeing strongly and nearly everyone else agreeing somewhat that the "partnership efforts to change the regulations are greatly needed." Moreover, this initiative is also viewed as giving grantees an important voice in how new regulations and other policies are crafted, with almost all grantees agreeing strongly or somewhat that it is now easier for grantees to have input on policy issues (question 'e'). More generally, the partnership effort is viewed, in this section of the questionnaire and others, as a fresh wind, with grantees consistently giving this initiative their highest endorsement and citing it as instrumental in ushering in a new atmosphere of trust and co-responsibility.

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[2] Responses of "no opinion" are generally not shown in the tables to follow; percentages in the remaining categories were calculated after excluding responses of "no opinion" from the base. Except where noted, very few grantees gave "no opinion" as their response.

It appears, then, that program policies are communicated clearly to grantees and are not perceived as being overly stringent or unreasonable. Nonetheless, the program regulations are viewed as more complex than they need to be, so DINAP's recent efforts as part of the partnership initiative to streamline them are viewed very favorably.

Table III-1
Opinions about Policy Guidance

	Agree Strongly	Agree Somewhat	Disagree Somewhat	Disagree Strongly
a. DINAP clearly communicates the program's policies	47.7%	45.0%	7.2%	0.0%
b. Our program has enough flexibility to address the needs of participants	37.5	54.5	6.3	1.8
c. Program regulations are too complex	16.4	43.6	30.9	9.1
d. The recent partnership efforts to change the regulations are greatly needed	67.6	27.8	0.9	3.7
e. DINAP's partnership initiative makes it easier to have a say in program policies	56.4	36.4	7.3	0.0

Note: Figures represent the percentage of grantees who gave the responses indicated, after removing from the base the small number of grantees who gave a response of "No Opinion."

Technical Assistance

In partnership with the National Indian and Native American Employment and Training Conference, DINAP co-sponsors training and technical assistance designed to communicate policy guidance and assist grantees in improving their program management. DINAP also periodically issues Bulletins and maintains a Web site, and its staff are available to provide support over the telephone or in person. As part of the Administrator Survey, grantees were asked whether their technical assistance needs were being met through these methods and how technical assistance could be improved.

Table III-2 shows that overwhelmingly grantees value the types of technical assistance they are being provided. Over 90% agree somewhat or strongly with each of the statements to which they were asked to respond, signifying in each case satisfaction with the mechanisms being provided to meet their technical assistance needs. Despite this strong and consistent expression of satisfaction, grantees offered numerous suggestions for how technical assistance could be improved. In fact, we received more comments on technical assistance than on any other topic covered by the survey: all together, over 70 grantees wrote comments on this subject.

For example, more than one-third of the grantees agree strongly and over one-half agree somewhat that the annual national conference "meets the needs of grantees" (question 'a' in the table). However, despite this solid support, grantees do see areas where improvements are desired.[3] For example, some feel that individual workshops could be improved:

> The national conferences are extremely helpful, (but) some presenters could be better. I would also like more hands-on training, and I want to hear more about what other grantees are doing.
>
> Provide information to support work-to-welfare.
>
> Add workshops to increase participants' motivation and excitement.
>
> Bring in experts from other federal job training agencies to conferences as presenters, to provide a broader perspective.

Some grantees also suggested that the workshops could be better tailored to meet the particular needs of subsets of grantees:

> Many of the workshops at the national or regional conferences are designed for the big non-reservation programs... Workshops should include ... ideas for small and reservation grantees, on how best to use our money.
>
> For technical assistance at the national and regional conferences, (it would be) beneficial to have beginner, intermediate, and advanced levels.
>
> It would be helpful to set up workshops at the national or regional conferences according to reservation/non-reservation status and according to the size of the grant.
>
> TA for experienced Directors ... should be in a round-table format or casual discussion group so that each person's expertise is utilized.

---

[3] It should be noted that, although DOL supports the conferences financially and otherwise, they are generally planned and conducted by the grantees themselves.

Table III-2
Opinions about Technical Assistance

	Agree Strongly	Agree Somewhat	Disagree Somewhat	Disagree Strongly
a. The technical assistance at the national conference meets the needs of grantees	38.9%	52.8%	5.6%	2.8%
b. The one-on-one Fed. Rep./Grantee sessions held at conferences help meet specific needs	65.1	33.0	0.9	0.9
c. The regional conferences provide a good oppty to get assistance from fellow grantees	60.7	34.6	1.9	2.8
d. I support the use of peer-to-peer technical assistance	73.6	23.6	1.8	0.9
e. The DINAP Bulletins provide important information about program requirements	76.6	21.6	1.8	0.0
f. I access the Internet to obtain information from DINAP that benefits my program	46.8	43.0	5.1	5.1
g. DINAP's partnership efforts have increased my willingness to ask questions when needed	57.0	39.3	2.8	0.9
h. DINAP staff provides accurate information when our program asks specific questions	56.0	39.4	3.7	0.9
i. DINAP answers our questions promptly	63.9	28.7	5.6	1.9

Note: Figures represent the percentage of grantees who gave the responses indicated, after removing those who gave a response of "No Opinion" from the base. Only small numbers of grantees gave an answer of "No Opinion," except for item f. on which about one-quarter of the grantees gave this response.

Sentiments on using federal dollars to defray the transportation expenses of smaller grantees were mixed. One grantee wrote that DOL should:

> Increase funding to accommodate 2-3 persons to attend the national or regional conferences for training and TAT.

But another felt that:

> I do not believe that the most effective use of TA funds is transporting small grantees to national conferences... These grantees would be better served by regional TA and peer-to-peer TA. It is nice to have them at the national conferences, but I don't feel the dollars spent are effective in providing for their specific needs.

And, thinking of those who never make it to the conferences, one respondent suggested that:

> If the grantee is unable to attend the national conference, send them the program year booklet.

Although the national conferences were much valued, some felt that regional meetings should also be promoted, to defray the time and expense involved in transportation:

> Need to break down regions into smaller regions and conduct workshops into each small region, so that grantee transportation will not be as far. Thus, more grantees will be able to participate.
>
> We would like regional meetings held in a location within our own state. Don't like traveling long distances.

As shown in Table III-2, another value of the conferences was the opportunity they afforded for the one-on-one meetings between grantees and DOL's Federal Representatives (Fed Reps), which were almost unanimously viewed as "helping to met grantees' specific needs" (question 'b'). But, on this issue again, grantees expressed diverse sentiments and opinions. Some felt that:

> We need more than 15 minutes to meet with our Fed Rep one-on-one at the conferences.
>
> The Fed Rep/grantee one-on-one should include a "report card" of how the grantee is doing, so annual goals can be focused on program improvements.

Others felt that individual sessions with Fed Reps were so valuable that grantees needed additional opportunities of this sort:

> Quarterly regional meetings with Fed Reps would help. Regional meetings provide a more informal ... atmosphere and more people tend to open up.
>
> There should be periodic regular contact with Fed Reps, at least by phone.. There is not enough direct contact.
>
> I believe if there were time and money, it would be of great benefit to me to have a ... visit from a Fed Rep to see how our program would rate.
>
> (It would be nice to have) one hour per month with our Fed Rep. It wouldn't be mandatory, but (it would be nice to know) you could reach your Fed Rep that day.
>
> Conferences have worked well for us...(but) nothing beats being able to meet Fed Reps one-on-one at other times of the year. Out-stationing, such as the efforts currently being undertaken, may be the solution.

Outstationing was also viewed favorably by another grantee who wrote:

> We are finally receiving the assistance we need by having the Fed Rep move into our area.

More generally, numerous grantees wrote comments on the nature of their relationship with their Fed Reps. Overwhelmingly, Fed Reps are viewed in a very favorable light, with over 90% of respondents agreeing strongly or somewhat that Fed Reps provide accurate and timely information (questions 'h' and 'i', in Table III-2). Moreover, the recent partnership initiative, in another strong endorsement, is viewed as "increasing my willingness to ask questions from the Fed Reps when needed" (question 'g', in Table III-2). Written comments reaffirmed these judgements and show that:

> The DINAP Fed Reps respond quickly and work hard to answer questions... I feel like DINAP staff act as advocates, which is a new role for them and very well received.
>
> In the last two years, technical assistance has improved so much...I don't have any problems talking with my Fed Rep.
>
> The Fed Rep has proved very effective.
>
> I get the help I request.
>
> My Fed Reps help me a lot; they always find the answers to our questions. We have a very good relationship.

But some grantees have not been so fortunate. Despite the strong positive responses from most respondents, others noted some difficulties in the help their Fed Reps provided, or offered suggestions for improvements:

> Answers provided by Fed Reps sometimes vary from one to another. (There is) too much specialization among Reps and sometimes the only person who could answer your question is not available.
>
> There is nothing more frustrating than talking to DINAP about an issue/problem than to be left in the lurch because the resolution or answer is not forthcoming.
>
> DINAP staff seem stuffy and unapproachable, making me feel inferior.
>
> Response time is not good.
>
> I asked about... and was unable to get a straight answer.
>
> More understanding from Fed Rep on all issues concerning JTPA programs; have had problems with Fed Rep assigned to our program in just basically understanding.
>
> It would be nice to get a clear yes or no, without the uncertainty that is often present.
>
> Fed Reps need to familiarize themselves with tribal structure and how things operate within tribes.
>
> To improve TA would be just to have Fed Reps understand what problems we face as a grantee located in a remote area.

Thus, although Fed Reps are generally viewed in a positive light, there have apparently been some problems with individual interactions.

If face-to-face meetings with Fed Reps are highly desired, so are peer-to-peer exchanges. Indeed, many grantees express a strong preference for receiving technical assistance in this way. For example, the survey showed that over 70% of grantees strongly support the use of grantee-to-grantee technical assistance, and another 24% support it somewhat (question 'd' in Table III-2). And respondents wrote:

> Shift more emphasis to peer-to-peer.
>
> More emphasis should be placed on peer-to-peer consultation. Personally, I believe this method is more effective.
>
> Peer-to-peer TA provides more assistance, as grantees basically know what problems we are facing in remote areas.

But peer-to-peer exchanges are not always easy to arrange, as some grantees noted:

> The opportunity is there, but with so many grantees from various backgrounds, it is not easy to get the assistance from fellow grantees unless we find one ... that is similar to us.

Still, this strategy might work better if DOL would:

> Disseminate information about peer-to-peer technical assistance... such as how to request it, who can provide it, cost limitations, etc.

With respect to disseminating information, DINAP Bulletins have been a long-standing means used by DOL to relate important program guidance. These Bulletins are overwhelmingly valued as an important source of information, with 77% of grantees agreeing strongly and another 22% agreeing somewhat that "DINAP Bulletins provide important information about program requirements" (question 'e', in the table). However, a few grantees noted that the Bulletins could be written more clearly, or that other written material would also be helpful.

> We would like to see an update to the Director's Manual. The organization of the manual can sometimes make it difficult to locate necessary information.
>
> I would like a more defined WorkBook on each service we offer—what we can do and what is not allowed. A WorkBook where we could turn to a page and find what we need on CSE, WE, SS, etc.
>
> Examples of actual participant files would be of great help.
>
> The only thing is that some DINAP Bulletins are written in "Washingtonese" and are a bit hard to translate.

The electronic exchange of information is another method of technical assistance increasingly used of late and one about which many grantees had strong opinions. In the survey, about 90% of those giving an opinion agreed with the statement that "I access the Internet to obtain information from DINAP that benefits my program" (question 'f'). Some respondents also had suggestions for how the use of the electronic highway could be expanded:

> Since most grantees have e-mail, I think it would be great if there was a listProc, where all of us could post our questions and receive answers from other grantees.
>
> Provide distance TA through Internet access, with on-line real-time interactions.
>
> (Make the) Friday Report available on line; it would be less expensive.
>
> Identify on the Web site what types of assistance are available.
>
> Allow grantees to fill out evaluations of conferences on line, after returning to our offices.
>
> Have all DINAP bulletins on line and use pdf format for larger documents. Utilize the Internet to send reports electronically.
>
> The Home Page and Netforum need to be kept more current.
>
> Use the Internet to provide discussion groups... Scheduled discussion times and sites should be established with prearranged topics; grantees wishing to participate could have advanced notice of time and topics to be discussed. This method .. would allow for either direct participation or merely observation for those who desire.
>
> Perhaps a question/answer from grantee to Fed Rep could be written on the chat line. Other grantees might have the same question and like very much to know what other Fed Reps might suggest. Also, grantee-to-grantee questions on the web (would be useful, as a way of seeing) how each handles specific problems.

However, some are clearly less comfortable with electronic interactions than others. For example, the question on Internet access was the only one in this section of the questionnaire that generated an appreciable number of 'no opinion' responses. Moreover, some grantees wrote:

> We're still having problems... We need help to get this to work (but) DOL staff are not always available to answer questions.
>
> Develop software that is user-friendly.
>
> Computer training at the national and regional conferences isn't helpful, because we don't know what the problem is with our computer.

Another area in which grantees feel the need for more technical assistance is in the information available for new Directors. Considering that not many respondents were new Directors, the number of comments we got on this topic was rather startling and suggests that new Directors need a better orientation to JTPA than they have been receiving:

> I feel that the technical assistance I sought at the National Conferences was unmet. It would be most helpful to have a thorough introduction to the JTPA program for new Directors.
>
> The previous Director left and no one is here to train the new Director. I'm learning by trial and error.
>
> More training is needed for new Directors. Hands on and show me type of workshops.
>
> Need more TA for new Directors...I more or less had to fend for myself because I didn't know what was offered ...New programs should be given TA immediately.
>
> When there is a new Director, it would be helpful to have an orientation on all aspects of the program.

Finally, we offer an assortment of other comments relating to various technical assistance and training issues:

> (Provide) more funding alerts.
>
> DINAP's response is good, but other DOL areas (e.g., accounting, OMB) are not in their control. Sometimes what DINAP staff says directly contradicts what these other offices say.
>
> TA should be provided without being cited for a deficiency.
>
> (We need) TA for operating in a rural area with very little funds.
>
> Reservation programs receive more technical assistance than urban programs. Provide more technical assistance that is relevant to urban programs.
>
> (We want) more on-site TA.
>
> During the past four years, DINAP has made every effort possible to provide good technical assistance. However, if grantees are not aware of problems, they cannot request assistance. Many grantees may not be aware of difficulties ... until it is too late.
>
> We want training seminars just for Directors, separate from the regular conferences.
>
> A well-run program with experienced staff shouldn't need very much help from DINAP.

Consultation

The partnership efforts undertaken by DINAP, grantees, and the Native American Employment and Training Advisory Council have attempted to improve communication and dialogue and give grantees an explicit role in decision-making, reversing the adversarial atmosphere that had permeated the grantee-DINAP dialogue in years past. We asked grantees about the consultation process, and whether they thought the partnership initiative had indeed made them feel that their voices could be heard.

In their responses, grantees express overwhelming support for the recent changes to the consultation process. For example, Table III-3 shows that two-thirds of grantees strongly agree and almost everyone else agrees somewhat that the partnership effort has made working with DINAP a more positive experience, and nearly as many agree that it has helped establish mutual trust and respect (questions 'a' and 'b', of Table III-3). Grantees also generally believe that DINAP does a good job of getting opinions from grantees before making decisions, with over 40% agreeing strongly and another 44% agreeing somewhat (question 'c'). As several grantees noted:

> I feel DINAP is working hard to support grantees and improve communication.
>
> The longer the partnership continues, the stronger will be the trust bond and the better the overall programming.
>
> Mr. Dowd has truly made every effort possible to include the grantee community in decision-making, problem-solving, and program changes... I believe we truly are partners with DINAP for the first time.

However, some grantees, even if only a minority, feel that not everyone's voice is being heard, either by DINAP or the Advisory Council:

> Partnership positions should rotate so all can be actively involved.
>
> Constantly work with grantees, and bring new grantees into the workgroups, so that work and responsibility can be shared.
>
> DINAP uses established committees as a means of consultation. However ... rarely are reservation program Directors included on these committees.
>
> We need to make sure all grantees are represented. Sometimes DINAP doesn't consult enough with reservations or on Tribal Government issues.
>
> Advisory Council members should keep in better touch with local grantees; they represent all of us.
>
> We need healthy dialogue at regional and national conferences ... Include other views besides the Advisory Council and workgroups.

Reinforcing support for electronic communications that was described above with respect to technical assistance, respondents overwhelmingly agree that "the Internet is a good way of giving and receiving information" for purposes of consultation (question 'd', Table III-3). However, they had some suggestions for how this medium could be used more effectively:

> Develop a newsgroup or listserv (for electronic consultation).
>
> (We recommend) more effective use of the Internet, particularly on the part of the Advisory Council.
>
> (We want) regular updates from DINAP once a month, relayed through the Internet.

Grantees also had other suggestions for how consultation could be improved:

> Important areas are outside of DINAP's control. Could they be brought into the consultation process?

Guarantee funding; grantees are non-confrontational out of concern for future funding.

Fed Reps should pay "consultation" visits, rather than merely site monitoring. Consultation visits would fall more into the partnership attitude and would be more conducive to communication and exchange.

Grantees working one-on-one with DINAP have the trust and respect for them. Grantees that do not have continual contact are still leery.

Table III-3
Opinions about the Consultation Process

	Agree Strongly	Agree Somewhat	Disagree Somewhat	Disagree Strongly
a. The partnership effort has made working with DINAP a more positive experience	67.0%	29.4%	1.8%	1.8%
b. The partnership effort has established trust and respect between DINAP and grantees	58.5	34.0	6.6	0.9
c. DINAP does a good job of getting opinions from grantees before making decisions	41.7	44.4	12.0	1.9
d. The Internet is a good way of giving and receiving information	65.6	28.0	6.5	0.0

Note: Figures represent the percentage of grantees who gave the responses indicated, after removing those who gave a response of "No Opinion" from the base. Only small numbers of grantees gave an answer of "No Opinion," except for item d, on which 16% of the grantees gave this response.

Reporting

As a condition of their grants, grantees are required to submit periodic reports. As part of the partnership initiative, DOL has worked with grantees over the last several years to ease the reporting burden, by streamlining reports and decreasing the frequency of reporting. We asked a series of questions in the survey about this initiative. Grantees also were asked to write their comments, and many did so.

In general, the recent revisions to the reporting forms are well received. As Table III-4 shows, almost all grantees agree strongly or somewhat with the statement that recent revisions have made the forms easier to use (question 'a'). As some noted in their comments:

DINAP deserved kudos in this regard... Streamlining the overall process is going well.

The reporting forms are excellent.

Nonetheless, an appreciable minority of the grantees (just over one-third) still find the forms too complicated (question 'b')

> Recent changes are a big improvement, but some line items are still confusing and we need to keep referring back to the reporting instructions
>
> Terminology is a bit much; too much jargon
>
> Definitions can be interpreted differently than intended. Definitions need to be more clear and specific
>
> Perhaps simpler explanations rather than lengthy wordy sentences.
>
> (We want) simple instructions and less time filling complicated forms (to save) more time for clients.

We also asked grantees if they felt that the Annual Status Report covers everything important about their programs. Almost 90% of respondents believed that it did, even though only about 40% thought so strongly. A number of grantees also gave suggestions for what they thought should be added:

> Many positive outcomes are not reportable on the form.... Grantees should be able to report outcomes that are uniquely relevant to them
>
> Time and assistance and coaching in interviewing techniques are vital to participants and should be accounted for in some reportable way.
>
> Reporting forms ... should cover other information and services we do for clients.
>
> Allow more explanation of our activities, even if it is just a couple of lines.
>
> Current forms do not include retention information or how many of our clients come through, who are still active but have completed a goal or goals.
>
> Report on time spent assisting a person who will never become a participant.
>
> I participated in the work Group that made the recent revisions... I urge that the process be revisited from time to time and not become a format set in stone

With respect to the method of reporting, DINAP has recently initiated plans to move to electronic reporting. Most grantees who gave their opinion apparently support this effort, with 32% agreeing strongly and another 47% agreeing somewhat that "submitting reports electronically is very convenient" (question 'd' in Table III-4) Some, in fact, seem very enthusiastic about this development:

> Shift reporting to totally electronic
>
> (We) want on-line reporting.

However, an appreciable minority expressed reservations, with 20 disagreeing that electronic reporting was convenient, and many others (about 36% of the grantees) declined to express an opinion (question 'd'; see footnote to Table III-4). Many, perhaps, would have their misgivings relieved if additional training were offered and the software were easier to use:

> We still have problems... Instructions were not clear.
>
> I would like more information on electronic reporting.
>
> Recent setbacks to DINAP software have made electronic reporting not as convenient as it should be.
>
> I would like to submit my reports electronically, but it is only offered for IBM compatible computers. I would like to see a version of the software made for the Macintosh.
>
> Some on-hands assistance at the beginning would be a help.

Finally, a few grantees voiced preference for a client-level reporting system, of the sort that was pilot tested several years ago:

> Recommit to a SPIR type system.

Table III-4
Opinions about the Reporting Process

	Agree Strongly	Agree Somewhat	Disagree Somewhat	Disagree Strongly
a. The recent revisions to the reporting forms make them easier to use	58.7%	36.7%	3.7%	0.9%
b. The reporting forms are still too complicated	10.5	25.7	40.0	23.8
c. The Annual Status Report covers all the information that needs to be reported	39.4	47.7	11.9	0.9
d. Submitting reports electronically is very convenient	32.4	47.1	10.3	10.3

Note: Figures represent the percentage of grantees who gave the responses indicated, after removing those who gave a response of "No Opinion" from the base. Only small numbers of grantees gave an answer of "No Opinion," except for item d, on which 36% of the grantees gave this response.

Performance Standards

Perhaps no issue has raised as much rancor among grantees over the years as performance standards. Grantees have argued that performance standards "drive our programs" and cause them to put externally imposed performance benchmarks ahead of the needs of their clients. Whether these arguments are more than rhetorical is unclear; after all, all but a handful of grantees have exceeded their minimum performance standards by wide margins year after year. Indeed, the vast majority easily meet their standards on all three measures, even though satisfactory performance on only two of the three is required.

Nonetheless, grantees do operate in extraordinary diverse circumstances, as Chapters I and II have made clear. Given this diversity, grantees could doubtless demonstrate their chief accomplishments more clearly if performance measures allowed for more flexibility. Moreover, grantees feel a lack of ownership of the current performance system, and this more than anything has bred resentment and ill will.

The Administrator Survey asked a number of questions about performance standards as a way of tapping grantee sentiments on this issue. Several key themes were raised, including whether the current performance measurement system is clear, fair, and provides meaningful measures of performance. The results are presented in Table III-5.

As the table shows, about 85% of grantees understand the current system (question 'a') and 75% are satisfied with it (question 'b'). Grantees also generally feel that performance standards provide targets that help them improve program performance (question 'c'), with over 70% agreeing with this statement. These sentiments are reflected in the following comments:

> The current standards are difficult to grasp at first, but are fair and feasible.
>
> Current standards (with narratives) are fine for us... Those happy with current standards should be able to keep them.
>
> I must say that I have never felt ... that the performance standards were onerous. They actually seem to be right on target.

However, an appreciable minority of grantees disagreed with these three questionnaire items. Moreover, although the model adjustments (used to set minimum standards for the entered employment rate and positive termination rate) are generally viewed as fair (question 'e'), they are also perceived by most grantees as difficult to understand (question 'd'). More importantly, although most grantees feel that the current measures "give us enough flexibility in running our program" (question 'j'), over 70% also feel that the measures "do not adequately reflect the goals or accomplishments of our program" (question 'f') and focus too much on job placements (question 'g'). Employability enhancements, which were introduced in PY 91 to give more flexibility, are generally viewed as having helped grantees focus on long-term training needs (question 'h'), but they too are viewed as difficult to comprehend (question 'i').

Thus, although the current system may be something that most grantees can live with and that some even prefer, sentiments are clearly ambivalent. In their comments, grantees gave a number of suggestions for what sorts of improvements they would like to see. Some comments reflected suggestions for additional measures:

> We should have periodic measurements for participants' progress while in the program, prior to termination.
>
> We should measure some services that do not necessarily require monetary involvement.
>
> Update the definitions on employability enhancements.
>
> Expand the employability enhancement outcomes.
>
> We need a way to claim credit for training assistance provided to our clients.
>
> Rather than job placement (success should be defined as having) the client complete the program.
>
> I would place more emphasis on pre-employment training.
>
> DOL measures quantity; it should be quality.
>
> (We should) terminate and re-enroll 2-year clients who are college students as completing successfully at the end of each year.

Other suggestions related to the methods by which measures would be established and standards set.

> A menu option should provide more flexibility.
>
> Use more narrative.
>
> I believe there should be another method for smaller grantees. If one client misses a goal, performance standards are thrown off.
>
> (We want) individually designed performance measures.
>
> Each grantee is in a unique position. Therefore to some degree the measurement of performance can be done on a case-by-case basis.
>
> Grantees should be given the opportunity to develop (measures) in addition to those currently used; standards would reflect more closely the thrust of the local programming.

Importantly, many of these comments are right in line with recommendations recently issued by a Work Group convened by DOL to assist in revamping the current performance measurement system, including its suggestion to move to a menu system.

add measures reflecting outcomes other than employment (i.e., skills attainment and community outcomes), and allow for grantee-determined measures.

Regardless of the system itself, some grantees would like additional feedback from DOL on whether they made their standards or not:

> (We should get a) letter or call on whether we passed or failed.

Others don't like the whole notion of performance standards:

> (I believe DOL should) eliminate performance standards.

While others think they should be made more stringent:

> Set performance standards high and punish the program if we don't meet them the next year.

Table III-5
Opinions about Performance Standards

	Agree Strongly	Agree Somewhat	Disagree Somewhat	Disagree Strongly
a. I understand the current performance standard system	35.1%	51.4%	11.7%	1.8%
b. Overall, our program is satisfied with the current performance standards system	21.3	53.7	19.4	5.6
c. Performance standards provide targets that help us improve our program performance	21.8	51.8	20.0	6.4
d. The model adjustments DOL uses to establish standards are too complicated	13.6	59.2	22.3	4.9
e. The process DOL uses to adjust performance standards is fair	9.8	59.8	25.5	4.9
f. The performance measures do not adequately reflect the goals of our program	22.3	51.5	19.4	6.8
g. Performance standards established by DOL focus too much on job placements	25.5	48.1	21.7	4.7
h. the use of employability enhancements has helped us focus on longer-term training	35.5	49.5	11.2	3.7
i. The definitions of enhancements are too difficult to understand	18.2	40.9	31.8	9.1
j. the current outcomes give us enough flexibility in running our program	21.7	45.3	31.1	1.9

Note: Figures represent the percentage of grantees who gave the responses indicated, after removing from the base the generally small numbers who gave a response of "No Opinion." "No Opinions" were largest, approaching 10%, for items d, e, and f.

Technology

The Department of Labor has recently initiated a strong movement to get all grantees hooked up electronically, to each other and the DINAP Home Page. Although grantees generally support these initiatives, responses included in the above sections on technical assistance and reporting suggest that some grantees are wary or need additional help. For example, we saw above that from one-quarter to about one-third of the grantees reserved judgement on whether they accessed the DINAP Home Page to get information or thought that electronic reporting was convenient.[4] Quite a few grantees also wrote comments that expressed a plea for more technical assistance on electronic issues and for user-friendly software.

In an effort to learn more about grantees' reactions to the technology initiative, we also asked a number of questions explicitly about whether grantees are accessing information on-line. For example, we asked if they were an "online partner" and, if so, whether they checked their e-mail at least weekly. As shown in Table III-6, responses to both these questions suggest that the technology project has made substantial progress. For example, over 70% of respondents indicated that they were online partners, and, of those who were, almost all check their e-mail frequently. Moreover, grantees are very receptive of the DINAP "Hot News Flash" and find the DINAP Home Page and Netforum very useful.

As part of an effort to improve the electronic capabilities of grantees, DOL has also recently considered developing an automated Management Information System computer software for free distribution to grantees. As part of the survey, we asked if such a program would be viewed as valuable. Grantees overwhelmingly indicated that it would, with 75% citing it as extremely useful, and almost all others rating it as quite or somewhat useful. In their comments, many grantees additionally emphasized how valuable such a system would be, but one suggested that:

> An automated MIS should include all DOL programs.

Clearly, it seems that grantees are receptive—even enthusiastic—about DOL's latest initiatives to improve the programs' technological capabilities. However, as the comments on technical assistance suggested, additional training may be needed to bring everyone up to speed.

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[4] See the notes to Tables III-2 and III-4.

Table III-6
Opinions about the Technology Initiative

	Yes	No	Not Sure	
a. We are an "on-line" partner	71.7%	28.3%	--	
b. We check our e-mail at least once a week	87.5%	12.5%	--	
	Agree Strongly	**Agree Somewhat**	**Disagree Somewhat**	**Disagree Strongly**
c. I enjoy receiving the DINAP "Hot News Flash"	73.4%	26.6%	0.0%	0.0%
d. The DINAP Home Page and Netforum are very useful to grantees	65.7	32.8	0.0	1.5
	Extremely Useful	**Quite Useful**	**Somewhat Useful**	**Not at all Useful**
e. How useful would it be if DOL were to develop automated MIS computer software for free distribution to grantees	75.5	16.0	7.5	0.9

Note: Whether grantees check their e-mail, enjoy receiving the news flash, and find the DINAP Home Page useful was only asked of those who were online partners. All percentages were calculated after removing those who gave a response of "No Opinion" or "Not Sure" from the base: these represent 19% for question c, 15% for question d, from among those who are on-line partners.

Overview of Grantee Relations with DINAP

As a way of summarizing sentiments towards DINAP, we asked grantees to rate the overall helpfulness of "the assistance you received from DINAP in accomplishing your program objectives." These results, reported in Table III-7, show that over 80% gave a rating of quite or extremely helpful, and that almost no one rated DINAP as "not at all helpful."

In general, then, grantees apparently have quite a high regard for DINAP. As the results presented throughout this section attest, grantees are particularly appreciative of the recent partnership initiative. There is almost unanimous appreciation of DINAP's strong efforts towards fostering good dialogue as part of the consultation process, and grantees believe that the recent changes in reporting and (inferentially) the recommendations of the Work Group on performance standards are on the mark. They greatly appreciate as well the strong efforts DINAP has made to see that their technical assistance needs are being met, although new Directors seem to need additional assistance. Grantees are willing to embrace recent efforts towards the use of more sophisticated technology, but some are wary and will need additional training and guidance.

In concluding this section, we present some additional comments provided by grantees in response to the query "What additional services or assistance would you like from DOL?"

> Provide more funding.
>
> Provide flexibility re economic development.
>
> Keep grantees aware of the legal aspects of all statutes and regulations of relevant agencies.
>
> Many suggestions are made to improve our program. But I would like to see for myself a program that is running "picture perfect," to get some ideas from them.
>
> We would like market information for our area.
>
> Each grantee needs a letter of recognition each grant year if they have met the goals of the program.

Table III-7
Overall Rating of DINAP's Helpfulness

Overall, how helpful is the assistance you received from DINAP in accomplishing your program objectives?	
Extremely helpful	39.4%
Quite helpful	41.3
Somewhat helpful	17.4
Not at all helpful	1.8

Evaluation of Other DOL Functions

Most of the questions and comments described above focus on relationships between the grantees and DINAP, the federal agency with which Section 401 programs are likely to have the most frequent contact. However, grantees also have dealings with departments or agencies within the Department of Labor other than DINAP. We asked grantees to rate their satisfaction with these additional DOL functions.

As Table III-8 shows, almost no one expresses dissatisfaction with any of these agencies, including the Office of Grants and Contract Management, the Division of Resolution and Appeals, the Closeout Unit, and the Division of Performance Management and Evaluation; put differently, those who express an opinion generally are somewhat or very satisfied. However, appreciable numbers of grantees—over half, in the case of the Division of Resolution and Appeals, and at least 30% in all other cases—express no opinion, suggesting that they either blur the distinction between DINAP and these other agencies, or have too few dealings with them to make an informed judgement.[5]

Table III-8
Satisfaction with Other DOL Offices

	Very Satisfied	Somewhat Satisfied	Somewhat Dissatisfied	Very Dissatisfied	No Opinion
Office of Grants and Contract Management	26.4	36.4	3.6	1.8	31.8
Division of Resolution and Appeals	18.2	18.2	6.4	0.9	56.4
Closeout Unit	26.6	19.4	11.0	0.9	32.1
Office of Performance Management and Eval.	23.4	27.0	7.2	0.9	41.4

PROGRAM GOALS

As discussed in Chapter I, Section 401 programs frequently operate in extraordinarily difficult circumstances, including trying to meet the needs of hard-to-serve program participants in often bleak socioeconomic contexts. Given these circumstances, they must balance diverse program objectives, from providing long-term training, to providing a source of income in the short-term, and from meeting the needs of individual participants to enhancing the well being of the community as a whole.

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[5] The "No Opinion" response category was an option in most other sections of the questionnaire that describe grantees' sentiments towards technical assistance, consultation, reporting, and performance standards issues. However, so few grantees checked this response category in these other sections (except for the few questions dealing with technology issues) that we have not bothered to show it explicitly up to this point.

As part of the Administrator Survey, we asked grantees what they view as their most important program priorities. Results to these survey questions are shown in Table III-9. Three goals, all very much in keeping with the intent of employment and training programs, loom as most important. Specifically, over 75% of grantees rate providing training, helping participants find jobs, and helping them achieve self-sufficiency as extremely important to their programs. Thus, at least to this degree INA grantees take a very traditional view of their chief functions.

Table III-9
Program Goals Identified by Grantees

	Extremely Important	Quite Important	Somewhat Important	Not at all Important
Providing participants with training	81.3%	17.9%	0.9%	0.0%
Helping participants find jobs	77.9	21.2	0.9	0.0
Helping participants achieve self-sufficiency	83.2	14.2	2.7	0.0
Assisting participants with their supportive needs	35.1	49.5	15.3	0.0
Providing participants with temporary income while in training	31.9	41.6	18.6	8.0
Providing a place in the community where people know they can come	63.7	27.4	8.8	0.0

Doubtless unique among other JTPA programs, however, about two-thirds also rate providing a place in the community as extremely important. Reflecting themes that will emerge quite clearly in subsequent chapters as the results from the site visits are described, the sense of community fostered by INA grantees is very important to the vibrancy and effectiveness of these programs, and that fact is reflected in these survey findings.

Although they are rated less highly, providing supportive services and providing temporary income are also viewed as important program goals. Thus, grantees find that not only must participants' long-term employment and training needs be met, but their immediate needs for sustenance must be addressed as well.

Finally, grantees were asked to write in any additional goals they had established for themselves. Among responses they provided were:

> Crucial role of our program is improving self-esteem; this is pivotal to our cultural identity.
>
> Provide career exposure.
>
> Encourage self-sufficiency so participants can function in two worlds—traditional and main line society.
>
> Provide direction and counseling for Native families.
>
> Help participants find other services.
>
> Intervention and mediation in employee/employer matters.

Another grantee, focusing on interests beyond those of the participant alone, mentioned that supporting tribal operations with subsidized job placements was also an important objective.

> Support tribal operations with subsidized job placements.

This objective also emerged clearly from our on-site visits, as will be discussed in the chapter later in this report on work experience and community service employment.

The survey results clearly suggest that grantees have diverse objectives in mind as they develop their service strategies. But, potentially, the program goals identified by grantees as being most important vary in important ways as a function of the contexts within which grantees operate. Job placements, for example, may be less important in service areas that offer few job opportunities, and instead training may come to the fore. Conversely, training may be less important for programs serving more job-ready clients in an active labor market, so a focus on quick job placements may become the priority. The complexity of program context cannot be easily characterized by any simple summary measure, but for analysis purposes we have crudely drawn a distinction between tribal and non-tribal programs. Table III-10 thus shows which program goals were rated as extremely important for these two types of grantees.

Overall, the results are surprising for how similar tribal and non-tribal programs view their mandates. For example, about equal percentages of both groups rate providing training, jobs, supportive services, and temporary income as extremely important; in fact, none of these differences attain statistical significance at conventional thresholds. Thus, if differences in the extent to which these goals are rated as important varies as a function of the socioeconomic context, tribal government status serves as a poor proxy.

Table III-10
Differences in Program Goals for Tribal and Non-tribal Programs

	Non-Tribal	Tribal
Providing participants with training	84.2%	80.6%
Helping participants find jobs	76.3	79.5
Helping participants achieve self-sufficiency	89.5	79.5
Assisting participants with their supportive needs	36.8	35.2
Providing participants with temporary income while in training	36.8	30.1
Providing a place in the community where people know they can come	79.0*	56.2

Note: Figures represent the percentage of non-tribal and tribal programs rating each program goal as "extremely important."
*The difference between the two groups is statistically significant at the .05 level

However, the table also shows that non-tribal programs are much more likely than tribals to rate providing a center for the community as extremely important (79% vs. 56%). It appears, then, that fostering a sense of community is viewed as less central to the mission of tribal JTPA programs, presumably because of their natural and historical sense of cohesion and because so many other agencies and events already serve this function in the tribal context.

SERVICES PROVIDED TO PARTICIPANTS

As a way of rounding out the in-depth observations from our site visits, we asked a series of questions about the services grantees provide to participants, including those relating to assessment and service planning and training and subsidized employment. We also asked them what made it most difficult to meet the needs of their clients. These results are summarized in this section.

Assessment and Service Planning

The first step in service delivery is assessing the needs of program participants for employment and training assistance and other support. We asked grantees in which areas clients were assessed and what methods of assessment were used. Table III-11 shows that participants' work history and barriers to participation are assessed almost for everyone. Occupational interests and skills and life skills are also usually assessed, and informal or mixed methods are likely to be used. Elsewhere, the table shows that reading skills and, less often, math skills are commonly assessed, usually (but not always) using formal tests of basic skills. Finally, when asked for additional areas of assessment, some grantees cited:

Substance abuse

Domestic issues

The participants' motivation and determination

The overall stability of the participants' personal situation (with respect to housing, income, etc.).

In general, then, it appears that most grantees conduct a wide-ranging assessment for all or most clients, covering a broad range of skill areas and supportive service needs. Chapter V will have much more to say about the characteristics of these assessment efforts and their overall quality.

Table III-11
Areas and Methods of Assessment

	For How Many Clients		Using What Methods	
	Assessed for All/Most	Assessed for Some/None	Formal Methods	Informal or Mixed
Reading skills	75.9%	24.1%	68.0%	32.0%
Math skills	59.5	40.5	62.5	37.5
Occupational interests	85.3	14.7	16.5	83.5
Occupational skills or aptitudes	72.2	27.8	15.0	85.0
Previous work experience	96.4	3.6	na	na
Barriers to participation	97.3	2.7	na	na
Life skills	68.9	31.1	na	na

Note: The first two columns report the proportion of participants assessed in each of the areas; the next columns report whether formal assessment methods or informal or mixed (formal and informal) methods are used (with responses of "not assessed" deleted from the computations). Methods of assessment were not asked for previous work experience, barriers to participation, and life skills, because it was assumed that informal methods were used.

Table III-12 shows that assessment results are just one of a set of factors that are taken into account in developing the clients' service plans—and in fact is among the least important factors. Other, more practical constraints must also come into play. For example, the availability of appropriate training providers is mentioned by more grantees as being extremely important than any other single factor, and it is rated by almost all grantees as being at least quite important. Participants' own preferences are also quite important. However, because only two-fifths of grantees cited this factor as extremely important, clearly participants' preferences are not the driving factor in service planning.

Other factors cited as important are the participants' ability to support themselves through training. The importance of the programs' own inadequate levels of funding—which surfaced again and again during our site visits—is shown by these survey results to also limit the types of services the participant can access, beyond what they ideally might want or need.

Table III-12
Factors Important in Determining Services Provided

	Extremely Influential	Quite Influential	Somewhat Influential	Not at all Influential
Results of basic skills assessment	28.4%	45.0%	22.0%	4.6%
Results of assessment of interests or aptitudes	27.3	49.1	20.9	2.7
Availability of training services in the area	54.1	40.5	5.4	0.0
Participant's own preferences	40.0	49.1	10.9	0.0
Participant's ability to support self through training	46.4	39.1	11.8	2.7
Lack of program funds to offer the training participant wants/needs	45.5	39.1	14.5	0.9
Lack of child care	37.8	32.4	26.1	3.6
Lack of transportation	47.3	30.0	19.1	3.6

Less important—but still cited as at least quite important by most grantees—are the participants' lack of access to child care or transportation. Some grantees also wrote-in responses that included:

The characteristics of the local labor market

The participant's commitment

The participant's lack of self-confidence

Problems with health or substance abuse

Clearly, case managers need to juggle multiple factors and constraints to arrive at a workable service plan for their program participants, a fact that will be made clearer in a subsequent chapter of this report.

Providing Supportive Services and Stipends

As the above results suggests, lack of child care or transportation are often important limitations on the types of services grantees can access. As part of their efforts to ensure successful outcomes for participants, INA grantees often must make arrangements to ensure that these limitations can be overcome. More generally, as part of the grant responsibilities, grantees can provide an array of supportive services to ameliorate so-called "barriers to employment," either in conjunction with employment and training assistance or as stand-alone activities. Similarly, grantees are known to provide stipends to help participants support themselves through training.

However, heretofore little hard information has been available to describe the prevalence with which these services are offered, because, unlike most other JTPA programs, the reporting forms associated with Section 401 do not elicit any information about the extent to which supportive services or stipends are provided. As part of the Administrator Survey, therefore, we attempted to redress this gap.

Table III-13 provides grantees' responses to the query "What proportion of your PY 96 JTPA terminees received the following services?" As the results show, grantees are providing an array of supportive services, to address the often multiple needs of program participants. At the same time, supportive services and stipends are being used very judiciously, as indeed they should be. Thus, all grantees are providing supportive services of some type to at least some clients, but in different combinations, presumably depending on the clients' individual needs.

Table III-13
Proportion of Terminees Provided Supportive Services and Stipends

	Almost None	Some	Many	Almost All
Transportation assistance	24.0%	33.0%	25.0%	18.0%
Health care	70.0	26.7	1.1	2.2
Family care (inc. child care)	37.8	40.8	16.3	5.1
Personal or family counseling	21.3	43.6	17.0	18.1
Housing or rental assistance	51.6	34.4	10.8	3.2
Relocation assistance	81.1	14.7	4.2	0.0
Tools, equipment, and clothing	15.2	38.4	39.4	7.1
Meals and other nutritional assistance	51.6	24.7	19.4	4.3
Stipends or help in obtaining financial assistance	19.4	23.3	30.1	27.2

Note: Figures represent the percentage of grantees who gave the responses indicated, after removing from the base those who gave a response of "Not Sure." "No Opinions" were largest, approaching 10%, for items d, e, and f.

Of the services inquired about, transportation assistance, personal or family counseling, and stipends are the most commonly provided, with many or all clients receiving these services in 35% or more of the programs. By contrast, health care, housing and rental assistance, relocation assistance, and meals and nutrition assistance are rarely provided in more than half of the programs.

Barriers to Having Clients Achieve Success

Finally, we asked grantees several questions to learn more about what makes it difficult to achieve success with clients. Two sorts of factors were asked about: external characteristics, such as characteristics of the local labor market, and characteristics of clients themselves that make it difficult for them to achieve their goals.

Table III-14, which reports these results, shows that, among external constraints, lack of job opportunities and lack of adequate funding loom as especially important. Over 50% of grantees rates these factors as very important and another one-quarter rate

Table III-14
Barriers Affecting Clients' Success

	Very Important	Quite Important	Somewhat Important	Not Very Important
External Constraints				
Restrictions and limitations imposed on use of funds	27.5%	41.3%	19.3%	11.9%
Performance standards requirements	19.8	45.9	25.2	9.0
Lack of training providers in the area	21.6	33.3	25.2	19.8
Lack of adequate job opportunities in the area	50.5	26.1	10.8	12.6
Lack of funds to provide the services our participants need	59.6	26.6	10.1	3.7
Client Characteristics				
Lack of motivation	47.3	34.5	17.3	0.9
Don't understand what it takes to get and keep a good job	41.8	39.1	18.2	0.9
Lack reading and writing skills	29.1	37.3	27.3	6.4
Family responsibilities	49.5	43.2	6.3	0.9
Lack transportation	44.1	32.4	16.2	7.2
Substance abuse	42.7	35.5	18.2	3.6
Reluctance to pursue distant jobs because of community ties	50.9	28.2	15.5	5.5
Cultural ceremonies make it difficult to attend trng/emplymnt	9.0	22.5	33.3	35.1
Are gang members	3.7	10.2	15.7	70.4
Lack work experience	54.1	35.1	9.9	0.9
Lack necessary life skills	36.9	42.3	18.0	2.7

Note: Figures represent the grantees' responses to questions 31 (external constraints) and 32 (client characteristics). Question 31 asks about the factors that make it "difficult for you to meet the needs of your ... participants;" Question 32 asks how important the client characteristics are "in explaining why some of them don't achieve their goals while in your program."

them as quite important. Restrictions on the use of funds, performance standards requirements, and lack of training providers in the area also are cited as quite important by more than half of the grantees.

Among client characteristics, the clients' lack of motivation is rated as important, as are their lack of understanding about what it takes to get a job, their family responsibilities, their lack of transportation, substance abuse, reluctance to relocate to accept a job, and their lack of work experience. Other responses written in by grantees as participants' barriers to successful achievements include these reasons:

Clients lack self esteem.
Long-term public assistance.
Racial issues.
Attitudes.
Lack of dependable child care.
Lack of transportation.
Participants don't communicate well with those outside the Native American community.
Cultural differences.
Attending school and trying to hold a job at the same time.

These factors round out the picture of client characteristics as tabulated from the Annual Status Reports, shown in Appendix B.

FINAL COMMENTS

In general, we have seen that grantees enjoy a relatively good relationship with the U. S. Department of Labor. They especially embrace the recent partnership initiative and related efforts being undertaken by DINAP to improve communication between grantees and the federal government and involve grantees in decision-making. They feel that DINAP expresses program goals clearly and that these goals allow them enough flexibility to serve their communities. Technical assistance needs are generally being met, and the national conferences, one-on-one meetings with Fed Reps, and peer-to-peer exchanges come in for particularly high praise; by contrast, additional efforts are necessary to meet the needs of new Directors and to ensure that all grantees get the assistance they need to become electronically connected.

Reporting and performance standards are topics about which some grantees are seeking additional improvements. Although by no means is dissatisfaction widespread, some grantees believe that the ASR omits some important information. Additionally, grantees would like to see more flexibility in a performance-standards system that would enable them to show their unique program accomplishments more clearly.

Grantees have also indicated how extraordinarily complex their challenges are. Program goals are multi-faceted and sometimes work at cross-purposes. In meeting the needs of their clients, assessment results are only one of a number of factors that must be considered; very real constraints include the absence of adequate funding, the lack of appropriate training providers, and the difficulty many participants have in supporting themselves through training. Additional factors making it difficult for some clients to achieve their goals are the lack of job opportunities in the area and participants' own weak motivation, problems with substance abuse, poor work histories, lack of appreciation of what it takes to get and keep a good job, and their reluctance to leave their communities in pursuit of job opportunities.

In concluding the survey, we gave grantees the opportunity to make comments on any other issue of concern to them. Some of the comments they provided have been related in appropriate other sections of this chapter, if the comments pertained (for example) to relationships with DINAP, performance standards, or reporting. We present below miscellaneous other comments.

> We need more funding!
>
> (With the funds I have) I can only serve 25% of the people that apply to our agency.
>
> Please explain why we get so little, but are expected to do so much.
>
> Want additional funds for education and training. We could be much more effective in helping tribal members achieve self-sufficiency if we could receive additional funding.... The ratio of available money to available participants is 2 to 10.
>
> I feel that the Title IV-A and II-B programs have helped the participants. I just pray that there will be no more budget cuts, because my budget is so small as it is.
>
> There should be only one Federal agency administering the funds allocated to Indian tribes, and the tribes themselves should be the sole authority on who is served by these dollars.
>
> Provide notification of E&T related conferences, whether DOL sponsored or not; more specific training.
>
> I need a computer expert in DC available all the time for consultation.
>
> DOL needs to take a better look at the quality of some programs.
>
> It would be helpful to have general guidelines that all grantees can follow. Federal regulations are too broad—which is good, because it allows tribes to design programs—but it would be nice to have standardized forms and policies/procedures, form the very simple to the complex.

The greatest obstacle facing Indian Country in general is the lack of employment opportunities within our communities. We can train individuals, but the result is always the same...the training to promote self sufficiency is all well and good, but if the (jobs aren't there) I see the outcome as superficial unless we get some concrete job developments in our area and throughout Indian Country.

With the partnership effort DINAP has made some tremendous improvements and I commend Mr. Thomas Dowd for his leadership.

One of the most important things about our program is the extensive network of partners we have established over the years.

The strength of the program ultimately lies in two areas: the grantee organization, and the program staff. Everything should be done to provide both with all the tools necessary for running successful programs. Efforts should always be enhanced to provide information, training , and support to the front line. Much is already being done, but even more is needed. One suggestion is to support the grantee organization to ensure its overall effectiveness. We must involve the *organization*, not just the program. Program staff cannot always be counted on to carry this out. Grantee Boards and officials should be involved in major issues involving JTPA.

Gaming creates jobs. Jobs creates income for families. Does increased income lead to increased ability, or remove families from the lifestyles learned pre-gaming? Section 401 should allow for working with persons with identifiable problems, even though household incomes exceed ... low-income levels (so we can serve) youth of the above households.

I wish we could use Title II funds with Section 401 funds when needed.

DINAP as a whole has improved. The overall grantee/agency relationship is that of a joint effort and no longer a dictatorship.

The unemployment rate (in our community) is ... very high, so it is very difficult to place participants in permanent steady jobs after they are terminated from JTPA.

DINAP needs to really listen to the small, reservation grantees.

Understanding by Fed Reps and DINAP that not all reservations are located close to urban areas and that achieving some goals are difficult. Not all participants are willing to leave the reservation and are content remaining in the local community, which makes it difficult to provide services. Despite these difficulties, JTPA is still trying to work with individuals needing our assistance.

Develop a self-check or self-evaluation program on the computer, so grantees can answer evaluation questions that will be read and commented on by Fed Reps.

If a grantee is meeting or exceeding their performance standards and has proven themselves to be effective in accomplishing the goals of the program, why do they need to compete for the JTPA grant every two years and go through the "notice of intent" and designation process? The designation process needs to be reviewed and revised to be fairer to current grantees.

Allow JTPA programs in small, rural isolated areas with at times limited employment opportunities a higher dollar amount than $4000 per participant. And of course we could use more money due to the change in the welfare reform. Our office has been flooded with phone calls.

Continue to do the good work you are doing...maintaining open communication with grantees

Our clients do not like to be in classroom training. We tend to lose out on a lot of clients because they do not like to be in class.

Off-reservation/non-tribal programs like ours struggle with funding resources...our funds are stretched so tight because we don't have access to the same support systems as the tribes.

DOL should give serious consideration to equity of service and dollars between reservation and off-reservation programs. For example, youth employment funds not go only to tribes and welfare to work funds go only to tribes. The fact is, the majority of Indians live in urban areas. Local providers of service very seldom include Indians in their target populations to be served.

The LLSIL guidelines are too low, especially with those families with children.

Really enjoy the Friday Report. This should go to all grantees, whether their grant has the money or not.

Our program is doing fine. We need this program, especially classroom training for the long-term. Our participants want to be self-sufficient--a real skill with a real future. That's what the program is all about.

As a community agency, we have problems meeting the expectations of some of our community members. Members have multiple problems and poor skills and want work, not training. Once clients terminate, they often return and expect lifelong services. Mentally disturbed clients have few places to receive help, or will not accept help.

To break the cycle in urban country we have to give back to our youth their identity of self. For our youth, we need to teach them their own tribal culture and give them activities, sports, etc. Unfortunately, no one funds these programs.

Good job, thank you.

IV. GRANTEE ORGANIZATION AND SERVICE STRATEGIES

GOALS AND OBJECTIVES

Going well beyond the snapshots provided by the Administrator Survey, this chapter describes the stated goals and objectives of the 23 INA 401 grantees that we visited on site and draws upon various documents provided to on-site researchers such as brochures, pamphlets, reports and Comprehensive Annual Plans. Where the goals and objectives were provided to us in written form, we were able to review the wording verbatim and conduct a key word content analysis. We further incorporate the paraphrasing of goals and objectives as they were voiced by program administrators and personnel who responded to us during our on-site interviews. No attempt is made to separate the written from the spoken, overall, but conflicting perceptions are noted when they occur.

This section incorporates both the general over-reaching goals of the twenty-three grantee tribes and organizations as well as the more specific goals and objectives described for their INA 401 programs. These two sets are somewhat blended together, with wording and concepts which generally coincide and link INA 401 goals and objectives to the grantees' organizational/tribal goals.

Before going into the analysis of content, we need to clarify the concepts of goals and objectives as they are operationalized in these programs. First, the objectives are not technically measurable. That is, they, unlike measurable objectives in some other federal programs, do not contain baseline participant levels of ability or levels of service nor a concomitant projection of the levels of success or attainment to be reached. They do not serve as predictors of program success except in a general way using words such as: to enhance, to increase, to provide, etc., nor do they provide a basis upon which to evaluate programs or particular services' effectiveness in any measurable way.

They do provide guidelines or frameworks. They are reflective of underlying beliefs of the tribe or organization and reflective of what the grantees perceive the function of the INA 401 program to be. They are phrased in positive language and often reflect the grantees' philosophy of service and purpose.

As to structure and specificity, goal statements and objective statements are used interchangeably. What one grantee may declare as a goal, another may state as an objective and vice versa. This is also true for statements of mission or purpose, whether they are organizational or programmatic.

If goals and objectives are meant to play a meaningful role in the design and implementation of program services, grantees should receive training in the construction of meaningful measurable objectives. However, since performance standards are currently the formula-driven quantitative measurements required to judge "success", there is a gap overall in reporting and evaluating the full impact of services upon participants.

Were grantees to write client-centered measurable objectives which match their services, they could have a framework for setting up processes to project, track and assess levels of skill/educational attainment and degrees of growth in knowledge and behaviors. This would give a broader picture of program results which would go beyond the categories of "terminations", would address qualitative as well as quantitative outcomes, and would be more inclusive of all of the actual services rendered to clients.

Samples of INA 401 program goals and objectives vary, ranging from minimal statements such as "formed for the purpose of providing employment and training to tribal members" to one-stop inspired language such as "creating a customer-driven system of integrated services to which there is universal access and measurable outcomes", to an extensive listing of objectives infused with culturally-relevant overtones. An example of this is "to work within cultural values and beliefs, both traditional and modern."

Taking a closer look at structure and specificity of INA goals and objectives, a few grantees only make perfunctory general statements or those which only restate the INA 401 regulatory purpose. They are developed to comply with the expectations of the funding agency and use such language as "the (INA JTPA) program will affirm the goals set forth by DOL". Of the 23 grantees in our sample, six or 26% did not go beyond the required basic statement(s) of service provision, to our knowledge.

The remaining 74% designed goals and objectives that were broader and more detailed, and incorporated and reflected the local community or tribal mission, purpose or underlying philosophy. These varied somewhat in terms of length and specificity but, in general, the grantees made statements which defined their program purpose, listed services offered, noted clients to be served, and stated generally expected outcomes.

A key word analysis of concepts which were used in the phrasing of goals and objectives provides us with one way to determine the emphasis grantees place upon programs, the variations, and the underlying purpose and expectations for program performance.

The following categories describe, in descending order, the frequency with which grantees construct concepts into goals and objectives. We may surmise, in turn, that the more frequently the words or concepts are found, the more importance is placed on them throughout the sample.

1. Services - "Services" of the JTPA program were referred to approximately 49 times throughout the goals and objectives, giving an indication that the program is, first of all, perceived to be a service-oriented program and that its main purpose is to provide services to its clients. While this may seem an obvious point, it is, in the context of being a program operated by American Indian entities, meaningful in that it coincides with the cultural value of "helping/serving others" and the expectation that these programs will truly be of benefit to the clients. The INA program staff with whom we visited with few exceptions exemplified and projected this belief. Included in the service category were: 1) references to services in general (9 times), and 2) references to specific services. Specific services included: Assessment and Placement (11 times); GED/ABE (7 times), Guidance and Counseling (7 times), Supportive Services (4 times), Careers (3 times), Literacy (2 times), Referrals (2 times), and Work Experiences and Voc-Tech each one time. The emphasis on "Service to Others" may also explain why it is, in the minds of some grantees, sometimes problematic to meet the needs of the clients when the program regulations or grantee policies do not provide the flexibility to do so.

Training and Employment Services is a category by itself and is addressed further on in this section. With that in mind, if the two were combined, "services" is the overriding concept stated in grantees' goals and objectives.

2. Outcomes - Some mention of positive "outcomes" as the result of the INA 401 services to participants was the second most frequently mentioned concept, occurring approximately 38 times throughout. This seems to suggest that "services will bring about positive results" is the operating expectation. As one might expect, those results are seen in terms of "skills attainment", "employability", "job placement", "increased earnings" and leading to unsubsidized employment, all of which suit the purposes of the DOL/INA 401 program. However, the goals (and sometimes the objectives as well) purport to go beyond "employability" and include self-sufficiency, well-being, quality of life, self-direction, self esteem, success and empowerment. A few grantees also included sovereignty (tribal) and self-determination, as over-riding goals as well as linking them to program goals.

The INA 401 programs are, therefore, seen by grantees as more than employment and training programs. Tribally-operated 401 programs are a part of the whole—that is, one of multiple services which the tribes operate for the benefit of their members and for which the members hold the tribal governments and programs responsible. Urban-based INA 401 programs goals and objectives do not reflect the "blanket of service" concept as strongly, but, where multiple services are provided, the same philosophy is reflected.

3. Clients - As the next most frequently mentioned, "clients" or participants are noted approximately 30 times throughout. In these instances the grantees included the clients or participants as central to the formulation of goals and objectives, not just focusing on the program services alone. In so doing, most emphasized that the purpose of their INA 401 programs was to serve or provide services to special populations which included the unemployed, under employed, economically disadvantaged, at-risk and/or hard to reach. Nine of the twenty-three sampled sites specifically mentioned the above categories and six specifically mentioned dropouts as inferred targets for services. Extending beyond the clients themselves, family and community were incorporated four times into goals and objectives. Three grantees referred to "individuals" or "personal" needs and benefits as well as client groups and two indicated that "getting people off public assistance" was part of their objective.

While addressing special populations is not unique to JTPA programs, the inclusion of family and community in tribal and urban organizational goals and objectives indicates a purpose more widely conceived and recognizes that the programs do impact families and communities as well as individual participants.

4. Training Assistance - Mentioned as frequently as clients was preparing clients to be employable (approximately 29 references). This generally seemed to include what is understood to be Training Assistance, such as instruction or counseling in areas including "entry into the workforce," "how to keep a job," "workplace maturity", "ethics", "dress and behavior on the job", "motivation", and other employability skills or behaviors. To some, it also carries the meaning of skills assessment, career searching, resume writing and other attendant topics which are not thought of specifically as classroom training for occupational skills or basic skills instruction. These we are grouping separately for purposes of analysis and contrast.

If one draws conclusions based on this analysis of frequency, Training Assistance is the most emphasized type of service and draws upon the premise that the special populations of INA 401 clients lack work place experience as one important factor in their unemployment or underemployment.

In this category are also those goals and objectives that specifically mention employment as the intended end result of program services and a primary program objective. This concept occurred 17 times in goals and objectives and by approximately the same number of grantees, indicating a substantial emphasis being placed on employment. This, no doubt, is driven by regulatory and performance-standards requirements but may also be indicative of the need to do "all that can be done" to reduce the high unemployment rates of clients in isolated tribal programs where the demand for jobs is greater than the supply. It also suggests that employment is seen as the most viable means to subsistence and survival to those who are economically disadvantaged, giving rise to the tendency to respond to these clients' short-term rather than long-term goals.

A later section of this chapter will provide a more specific analysis of service emphasis among the grantees.

5. Descriptors - This category contains those words that describe the nature or quality of the services or service design. Such descriptors are included in grantees' goals and objectives approximately 20 times. They are indicative of the overall functioning of and between services and use terms such as "coordinated", "working collaboratively" or "in partnership with others" (8 times). They also describe approaches as being "comprehensive", "holistic" or "integrated" (9 times). In this vein, three make mention of the "one-stop" service approach. There is a tendency to include this language whether or not the reality is being accomplished. For example, not all grantees are always successful in collaborating or forming partnerships, as is explained in other chapters of this report.

Most interesting is the "holistic" idea that seems to coincide with cultural values and current one-stop thinking at the same time. It is noticeable that those grantees who are moving most rapidly towards one-stop services are also those who include one-stop concepts in their goals and objectives.

6. Education/Training - Specific mention of education or training as a goal or objective occurred 19 times. References to "education" of clients is used as a broader holistic type of goal while "training" seems to be more descriptive of activities and services. "Education of (their) citizens/members" is one of the overriding goals found in tribal Education and Training Department goals that were provided to us and is then linked to the training goals or objectives of the INA 401 programs. We do not here attempt to explain definitively what is meant by "training" but assume it includes both the formal classroom training for basic skills and occupational skills as well as training received in job-related Work Experience, Community Service and On-the-Job Training.

This category and the Training Assistance category are not therefore mutually exclusive. Taken on the whole, however, the training related to short-term employment seems to have a somewhat greater emphasis than those related to long-term employment.

7. Culture - One might expect to find mention of culture more frequently than the eleven instances found in the goals and objectives. The word itself is not found in all samples of goals and objectives, but other words are also used that are culturally or historically related, such as "survival", "sovereignty", "holistic", "racial attitudes" and "ethnic identity" as well as references to tribal members, Indian people and communities that connect the INA 401 programs to the cultural goals of the tribal or organizational grantees. Extending the idea to incorporate "contemporary tribal life" as a part of "culture", we can also combine the last category, economy, with this one and see a larger inferred importance of culture beyond the obvious one.

8. Economic - This last category, "economic," refers to mentions made about the local or tribal economy, about tribal economic development and about economic self-sufficiency. In essence, the economy of the whole and the economy of the individual are seen as one entity. The economic concept is linked not only to the negative conditions of poverty and joblessness but also to the positive aspirations of employment and self-sufficiency. As other parts of this report describe, the economic conditions of the service areas of INA 401 grantees play a major role in the design and functioning of the INA 401 programs. Specific mention of "economy" or "economic" is made nine times through the grantees' goals and objectives.

In summary, grantees' goals and objectives have key elements in common but are very diverse in construction and format. They serve the purpose of putting general objectives in writing but, with few exceptions, are not stated in measurable terms and are therefore not conducive to forming evaluative judgements as to participant progress over any given performance period.

AMOUNTS AND SOURCES OF FUNDING

The twenty-three selected projects in this study have Section 401 budgets that range from a high of about $7,000,000 to a low of barely $50,000. The majority of the sampled projects operate their Section 401 program solely on the DOL-JTPA grant, but, depending on the grantee, whether tribe or Indian organization, many also have a number of other resources on which to draw to assist potential and actual JTPA participants. The majority of the projects in the study attempt the "one stop" service delivery because they recognize their clients have needs that supersede the basic services of the JTPA program. Housing, food, health care, transportation and childcare are "other" areas of need. The JTPA-401 grantees have utilized a variety of strategies to meet these needs. Tribal JTPA grantees utilize those resources more readily available to them, such as: Department of Interior-related programs, Adult Education, Tribal Employment Rights Office, Department of Health & Human Services, Indian Health Service, Department of Commerce, and Department of Housing and Urban Development. These resource services are coordinated with state agencies in some instances but not necessarily with funds. State employment agencies are helpful via the JOBS programs as far as referrals are concerned, but the tribes have a strong stance in regard to their sovereignty and are cautious when coordinating with states.

Tribally Operated JTPA Programs

As mentioned previously, the tribal JTPA programs comply with the overall goals and objectives of the DOL-JTPA requirements and design their programs in the best ways that "fit" their tribal members' needs. Many tribes contribute "in kind" to their INA 401 programs by providing office space, furniture, utilities, and, in some instances, fringe benefits. In those instances where the tribes are isolated and few opportunities exist for employment, some tribes supplement (if resources are available) the JTPA participants' income when their eligibility for JTPA services has reached its limit. For example, one large tribe has employment as a priority and contributes its own money to extend JTPA services. Several medium-sized tribal JTPA programs augment the Title II-B, Summer Youth Program, with their own funds and coordinate other tribal resources to provide their tribal youth work experiences. These tribes recognize the value of the summer youth program to provide positive activities, in attempts to deter negative influences on tribal youth that may prevail if they are not actively employed.

Smaller tribes have invested their JTPA funds in personnel in order to provide JTPA applicants with a human resource that has the ability to refer, network and coordinate a number of available resources that the applicant may need. These tribal JTPA personnel use formal and informal networks to provide needed services. The formal network of resources these personnel use may range from the "routine" JTPA services: OJT, WEX, CRT, CSE to connecting to tribal services to accessing JOBS, BIA, etc. The informal network could range from knowing someone who works for tribal housing to secure housing or knowing someone in social services who can provide childcare. This investment of small tribal JTPA project funds on personnel may appear, on first glance, to be providing employment for a few people, but in retrospect may be a quality investment that allows the small tribal JTPA program to maximize its budget by employing knowledgeable people who can access many resources and thus serve the client in a variety of ways.

This study has also revealed the age-old problem of tribal-inter-organizational - personal politics. While many tribes in this study have "stable" governments, there are changes every several years in the leadership of these tribes. These leadership changes, at times, affect the direction, personnel and services of the JTPA programs as well as the operation of other tribal programs. For example, one grantee that we observed operates its JTPA program in isolation from other tribal programs even though they are housed in the same building. Tribal political leadership changes may influence, who, how and what JTPA services are rendered. For example, Program Directors are changed and JTPA staff become divided on tribal issues when tribal elections change heads. This is a sticky issue and one not easily addressed, but it does occur. The conflicts that arise in the "competition" between tribal programs could cause delivery of services independent from one program to another.

This study has found that extreme diversity exists between small tribal JTPA programs and large JTPA programs in regards to budget and accessing "other" tribal programs. Factors that influence these two entities are the tribal administrative structure and other available tribal resources. Large tribal JTPA programs have larger budgets, larger populations to serve, larger services areas and larger "other" resources on which to draw. However, larger doesn't always mean better especially when the typical barriers to employment still exist: fewer opportunities for employment, fewer opportunities for classroom training, and lack of transportation to access JTPA services. The problems of serving clients in large tribal JTPA programs are compounded almost exponentially, along with the difference in dollars received as compared to small/medium-funded tribal JTPA programs.

Indian Organization JTPA Programs

Indian organization sponsored JTPA programs' budgets range in size from $2.37 million to $65,626. Many of these organizational JTPA programs are located in urban areas. These projects have goals and objectives that conform to DOL guidelines, and services are provided similarly. A remarkable quality of these urban-based projects is their ability to access resources from a variety of entities to provide "one-stop" services to their clients. Though conscious of tribal sovereignty, the urban projects aren't as compelled as tribal JTPA projects to ensure that their tribal jurisdiction not be compromised by interaction or cooperation with municipal or state governments and private social service providers. They have successfully garnered funds to their organizations from agencies such as: State Drug-Alcohol Abuse programs; AIDS-HIV Awareness and Prevention; private foundations; State Department of Health; Office of Economic Opportunity; Department of Health and Human Services, Administration on Aging; Department of Agriculture; Community Development Block Grants; and city and county social-health-education services. Local private industry has also partnered with many organizational 401 projects, and is contracted to conduct projects related to that industry; this in turn provides income for INA 401 grantee organization.

Organizational JTPA programs face many of the same problems tribal JTPA programs face—isolation (social-cultural), large service area (many in large urban areas), accessibility (transportation), hostile environments (participants alienated from society), and visibility/communications (small populations/amalgamated with other minorities). This is the motivation for the organizational JTPA programs to attempt to be "one stop" in the provision of services. Urban JTPA clients may be desperate for help and the Indian organization may be their only life line. If the sponsoring organizational JTPA project can access related social services from other agencies, they stand a better chance to help their Indian clients and achieve their JTPA goals and objectives with participants. If participants' immediate needs can be addressed (housing, health, food, clothing, child care) then they may be better able to participate in Classroom Training, Work Experience, Community Service, On-The-Job Training or Summer Youth programs.

It is amazing the networks that these organizational JTPA programs secure to meet their clients' needs. Their proximity to the various resources allows them access to these programs that may not readily be available to most tribal JTPA programs.

JTPA Budget, Reduction Impact

DOL budget reductions, without exception, negatively effected all projects in this study over the past two years (PY 95 - PY 96). JTPA program services of the 23 programs in this study had to be curtailed: some participant services were ceased at mid-year, a dollar cap on per participant services was imposed by several projects ($175/each, $10,000/each), employees were terminated, consolidation of JTPA offices occurred, workload increased for staff, fewer coordination meetings were held, and an overall reduction of services occurred. Some tribal and organizational programs supplemented the JTPA program funds and services but most did not have the resources and attempted to continue their programs on a restricted basis. Needed participant services exceeded the available JTPA resources, and projects with limited resources were hard pressed to meet their clients' needs. The organizational JTPA programs appeared better able to meet client needs due to the variety of social-health-housing resources available in their service areas (mostly urban). These organizational entities for the most part because of their proximity to municipal, county and state resources, were able to access these resources and provide a variety of services not readily available to tribally sponsored JTPA programs. Some tribally sponsored JTPA programs are able to supplement their JTPA programs if they have economic development or other tribal projects in progress. For some tribes, casinos have provided the impetus to develop a variety of tribal projects that otherwise may take years to initiate via the Bureau of Indian Affairs, other tribal resources, or private investments. However, the tightening of the federal budget has placed needy tribal people more at risk, because of limited JTPA services in areas that already have few employment opportunities. Regardless of the opportunities for training for JTPA participants, the prospects for employment are often dim. The budget reductions compound the problems faced by INA JTPA projects in this study.

COORDINATION

In order to meet JTPA client needs, tribal and organizational JTPA INA 401 programs must draw on a variety of resources. All projects—large, medium, and small—have established a network of resources on which to draw, refer, and place JTPA participants. Those JTPA 401 programs serving urban areas have more opportunities to access resources that serve all people than do the tribally-sponsored programs, simply because they are in close proximity to those services. Conversely, tribal 401 programs have access to services available to tribes that may not be available to more urban projects, although they may have access to some of these non-tribal services also.

The state employment service and JOBS program are likely components that are available to 401 projects. Likewise, local school districts (for GED, Basic Skills) and higher education institutions, both public and tribally controlled colleges, are accessed for CRT. Many of the 401 programs coordinate with Local/State/Federal Drug and Alcohol Abuse/Prevention programs. Childcare appears to be of concern to JTPA participants and, as such, most 401 programs attempt to access this resource through the tribe or sponsoring agency (e.g., Head Start). Some states have Indian Affairs offices that may assist the 401 programs in becoming aware of state social services, education opportunities, health service, child care, vocational rehabilitation, veteran affairs and employment and training services. These state Indian Affairs offices keep the Indian communities abreast of pending legislation that may directly effect them and also serve as advocates for tribal communities in their respective states.

Tribally sponsored 401 programs are acutely aware of the need to maintain their sovereign status and are vigilant in maintaining this status in their interactions with state agencies. Many states throughout the USA seek to impose their jurisdiction over tribes to regulate how the tribes operate within those states. However, United States Supreme Court decisions have upheld the sovereignty of tribes and maintain their status of equality to states. Some tribes are so large that their 401 programs have huge budgets, intricate administrative structures, huge service areas and must "deal" with an overall tribal bureaucracy that is on the scale of a state bureaucracy. One tribal sponsored 401 program of medium size has a 13 county area with several large metropolitan cities within its service areas. The size of the service area, scattered location of clients' residences, and isolation (social-cultural) make for employment and training barriers that are most complex. These factors combined make it necessary for 401 projects to be creative, innovative and persistent to meet the needs of their clients. The barriers of few employment opportunities, transportation problems, some social alienation and budget reductions (i.e., reduced services) combined cause the frustration for JTPA participants and JTPA programs in being able to serve clients. Thus, coordination of available resources is paramount to 401 projects.

Regardless, 401 projects in this study have done a remarkable job of identifying resources in their service area and accessing them. Arts, cultural and museum organizations, tourism, gaming and athletic (running) organizations, Indian Health Service, programs for the elderly, childcare, and domestic violence programs funded by city, state and federal auspices are a few "other" resources accessed to serve JTPA participants. If fewer resources are available, the 401 projects access those few, such as the county court systems for WEX, regional coordinating council/economic development for placement leads, temporary job services, community centers, energy assistance programs, tribal newspapers, state private industry councils, and veteran programs. One 401 program lists 27 agencies with which they coordinate as an organization to serve their native communities. Those small 401 projects, who invest in JTPA staff to provide services/referrals/assistance, utilize the staff's experience and knowledge of local conditions to access employment, training and social services for their clients. Some 401 grantees' sponsoring agencies are more aggressive than others in pursuing organizational funds. Many tribes are initiating or pursuing economic development projects that have or will have an impact on employment opportunities, should they be successful. The 401 projects' sponsoring agencies often submit proposals to various federal and private entities for projects that may directly provide employment, training or on-the-job opportunities for JTPA participants. However, the ebb and flow of funding for these agencies (recently ebb) have limited a lot of these economic development proposals to not be funded.

In summary, 401 budget allocations and coordination of services appear to reflect the needs of clients and available resources and are directly related to the goals of the sponsoring organization and the motivation (aggressiveness), experience, and creativity of those who work in the projects. Tribally sponsored JTPA programs, in their efforts to economically develop their tribal lands, face monumental tasks securing funds for these projects while striving to maintain their sovereign status. Indian organizationallysponsored 401 programs face a similar dilemma in that their Indian constituents are dispersed over a large area, are as "at risk" as their reservation/rural based kin and many fall through the cracks due to their invisibility in the urban areas.

Coordination of services is key to 401 sponsoring agencies' ability to meet the needs of the Indian community. A thread that emerges and is consistently voiced by JTPA participants is that they choose and feel more comfortable working with other Indians. Although they are eligible for services from any public agency, 401-JTPA participants at times feel alienated from those agencies. Section 401 grantee agencies try to be a one-stop operation; some have reached that goal, others are still in pursuit.

STAFFING

Staffing for 401 JTPA grantees in this study range from a high of 106, to a low of 1. Depending on the size of the project, there may be field offices that have anywhere from 3-5 staff persons. For example, one large tribal JTPA Program has one main JTPA office at the tribal headquarters and five field offices and nine sub offices on a reservation that covers 4 states. A large urban 401 grantee has 10 field offices that cover 15 counties. A tribal grantee JTPA program covers almost one half of the state (22 counties), with its main office on the reservation and field offices in three large metropolitan areas. A large tribal grantee has a main office at the tribal headquarters and 12 field offices to provide services in a 14 county area. The remaining grantees in this study have 401 projects in one location in their service area.

Staff Positions

Program staff includes Project Directors or Managers, Project Assistants, and Other Staff. Their major roles are described below.

Project Directors/Managers. All 401 programs in this study had a Project Director, Executive Director or Program Manager with primary responsibility for overseeing the implementation of the JTPA program. Some primary JTPA administrators had multiple-responsibilities with the sponsoring agency, such as: TERO Director, Executive Director of the sponsoring organization, or coordinator of several tribal programs. Most JTPA Directors were experienced and long term in their positions. For example, some primary Project Directors are carried over from the CETA project times and are well aware of the history and progress of the 401 JTPA program. These long-term Project Directors are able to maneuver in the political arena of tribal and organizational worlds to assure consistent and effective services to their JTPA clients. Some are more adept at these maneuvers than others.

Some Directors are less experienced. One Project Director left "under a cloud" -- records were missing, and the new JTPA Project Director and staff had a difficult time in reassembling the records. Another exception was a Project Director who was in her first year; however, she had participated in the JTPA program several years before and had personal qualities that enabled her to administer the program well and continue services on the same plane as before.

Project Assistants. Many 401 projects have JTPA project assistants, or assistant managers, who in many ways conduct the baseline management of the project. They oversee or conduct client assessment, intake and placement. They assure that all aspects of their JTPA programs operate in conformance with DOL requirements and maintain communications among the field offices and the main office. They serve as liaisons between administration and the day to day service providers and clients.

Other Professional Staff. The day to day "on the street" staff—intake personnel, counselors, and directors of placement—provide the bulk of the support for services of the JTPA programs. Depending on the size of the projects, these staff persons perform multiple tasks and are cross-trained to be able to assure clients' needs are met, even if one of the designated staff for a certain task is absent or a position is vacant. They use their people skills and knowledge of tribe's culture and language and service area/environment to make clients feel comfortable in their participation in the JTPA program. Comfortable in this sense means being caring, listening, being supportive and serving as an advocate. Many of these staff persons have participated in various JTPA services themselves and can be empathetic in assisting JTPA clients in many ways.

Concern for Clients

Each of the 23 programs in this study had a genuine interest and commitment to provide their clients appropriate and effective services. The 401 project staff understand the need for "Indian people to help other Indian people". They understand that for a lot of Indian people (clients) it may be difficult to seek assistance from non-Indian people. As such, a premium is placed on respecting the individual, meeting their needs in an unobtrusive way, and trying to anticipate their needs in an unfamiliar (new) environment. Provision of JTPA services in some projects emphasizes consideration of culture, considerations of language and, in most cases, consideration of the culture of poverty. The term "family" surfaced time and again in reference to grantee staff. "Family" may be described as working well together, sharing information and cooperating well with fellow JTPA staff persons. There are exceptions of course, but the concept of family was generally quite strong.

Employment Practices

Most of the 401 JTPA programs practiced Indian preference in hiring staff. Those non-Indian staff employed by various programs had similar commitments to serve Indian people as the Indian staff. They were accepted by the Indian staff, and many proved their commitment by modeling their actions/interactions with tribal people in many and varied ways. Several projects (informally) practiced tribal preference in their hiring. Although not stated, these projects sought tribal people to staff their projects for ethnocentric purposes, or were under the impression that tribal people knew their own people better and could serve them better.

Summary

In summary, most Section 401 grantee staff are long-term employees, understand the JTPA program and its intent, have experience in working with their clientele and employers, and have a wide network of resources upon which to draw. The fact that most grantee staff are long term meant that they could provide consistency and institutional memory to the projects, although long tenure could also cause complacency and the routinization of services. By contrast, some grantees had a high turnover rate among staff, often due to the low salaries that JTPA programs could pay. In these instances high turnover rates may cause some loss of program effectiveness because of the loss of experience, expertise, and institutional memory, although new staff contribute new ideas. In any case, it does appear that the effectiveness of the 401 programs is directly proportional to the quality of the grantee staff.

SECTION 401 SERVICE EMPHASIS

This section describes the design of INA 401 programs, what services are given emphasis and what services are minimized or omitted. We also comment on factors that influence decision-making effecting service provision throughout the sample. In order to comprehensively synthesize the overall picture, we first describe the general structures of INA 401 services in aggregate form to shed light on which services are emphasized in these programs. We then describe the services separately, noting causal factors in the differing sites related to priorities placed on service delivery. To the extent that it is useful for analysis, we provide a contextual background for service selection and delivery.

Data sources from which we drew to determine services and evaluate designs include: the 23 site visit reports conducted under this study, which contain descriptions of all services, computer-generated printouts of service activities of participants from the Annual Status Reports for all grantees in the sample for PY 96, and cost breakdowns for all grantees in the sample for PY 96 from the same source.

Extent of Services

Given the service options available to INA 401 grantees—namely Basic Skills Classroom Training, Occupational (or Job) Skills Classroom Training, On-The-Job Training, Work Experience, Community Service Employment, and Training Assistance—to what extent do INA grantees provide a variety of services/options for clients? PY 96 participant data indicate that six or 26% of our sampled grantees provide all six of the above listed educational and training services, twelve grantees (or 52%) had participation in five of the six services, while 4 (or 17%) had participants in four services, and one grantee (or 4%) indicated participants in two services only. Combining the first two percentages, 78%, or over three-fourths, of the INA 401 grantees provide at least five of the six allowable services. Figures indicate that most grantees make the effort to distribute funds across the spectrum of services to allow for multiple options for clients and multiple services.

This coincides with the emphasis stated in most grantees' goals and objectives, namely that service is their main mission and purpose. That appears to translate into "as many services as possible for as many participants as possible". This does not mean, however, that all services are given equal importance nor that all services impact long-term goals for the participants, even if they are meant to be aligned with long-term goals and objectives of the INA 401 programs and grantee organizations.

Comparison to Goals and Objectives

We compared grantees' goals and objectives to the priorities and emphasis given to the service options—comparing what the programs purport to provide to what services they actually do implement and the extent to which participants are placed in the services. Three categories describe the findings:

1. Yes - Fifteen of the twenty-three INA 401 programs do appear to utilize service options that match their goals and objectives. For example, where terms such

as "long term" or "occupational skills" are used, the participation in classroom training is sizable; likewise when "job skills" and "reduce unemployment" are prominent, so are work site training and training assistance. These grantees go across the sample and include tribal, corporate, rural and urban grantees.

2. Somewhat - Five of the twenty-three sites do a pretty effective job of matching services to goals and objectives. In these instances, grantees attempt to fulfill goals and objectives but fall short either because the goals are not attainable or lacking, because little training assistance is provided, because dropouts are not targeted as stated, because long term training is not emphasized or because higher percentages of funds are used in short-term activities than in long-term classroom training. These instances are found more frequently in rural, tribally-operated programs. Because they have been in operation since the CETA program, some have probably not adequately adjusted their goals and objectives over time to accurately reflect the funding cuts that have shifted priorities and reduced or eliminated some prior services.

3. No - Only three of the twenty-three grantees provide services that are contradictory to their goals and objectives or do not provide the options they claim to. In two cases, objectives emphasized education, training and employment, but the grantees actually serve participants through Training Assistance only, Direct Placement referrals, weak basic skills services and spousal support services. These instances occur in rural tribally-funded programs with relatively small budgets, suggesting a need to reexamine goals and service priorities to better align and focus upon clients' needs and the most effective approaches to address those needs.

Issues and Factors Influencing Service Designs

What issues or factors determine how grantees design services and place priorities? Based upon an analysis of grantee documents and on-site interviews, we focus on seven categories that describe the major issues or factors that drive the design and delivery of services in the INA 401 sampled programs.

1) The Labor Market - All programs are influenced by the labor market —by the ratio of available jobs to the number of unemployed. The majority of sites strongly indicate a need for more jobs/job development and a lack of economic development. Only two sites, one tribal and one organizational, indicated a sufficient supply of job opportunities, which afforded easier access for Direct Placements and referrals. Other labor market factors include the seasonal nature of the tourism industry at three sites

and the existence of casino employment as a positive factor at four sites (three tribal and one urban site). One result of the lack of jobs is the reliance on Work Experience and Community Service Employment for placements in grantee offices and programs, both tribal and organizational. Seven grantees specifically noted tribal economic development and tribal job opportunities as a significant factor in their service selection.

2) Reduction in INA 401 Funding - Thirteen grantees cited cuts in funding as a primary factor in service design and delivery. Citing cost effectiveness and low cost services as the rationale for service design and delivery, Training Assistance and Direct Placements are utilized more frequently. Conversely, funding cuts result in reduction in Classroom Training services, Support Services and Community Service Employment. Work Experience, in most programs, remains a priority, although fewer participants are placed than in prior years of higher funding. The basic skills Classroom Training which are operated/provided by grantees themselves rely on volunteers or underqualified instructors as one way to deal with inadequate budgets.

3) External Problems with Private Sector and States - Twelve grantees indicated operational barriers as a result of communication or implementation problems with private sector employers and state agencies. The predominant issues center on employer problems in On-The-Job Training services. Among the stated problems with employers is their reluctance or refusal to hire participants at the conclusion of the training period, abusing the service, prejudice/racism, poor communications and failure to provide participant reports. Two tribal grantees stated that tribal sovereignty was not understood or recognized by the state agencies with which they coordinated. These external factors are very problematic and ones which grantees perceive to be out of their control to change. Only one grantee stated that "vigilant efforts on the part of the JTPA staff" brought about very successful coordination of the OJT service with the private sector in their service area.

4) Geographic Size, Distance and Transportation - At least eight sites must meet challenges created by their large geographic size and resultant wide dispersion of the INA 401 service population. These sites are statewide, multi-state or multi-county and are primarily tribally operated, although a few are organizational grantees. Because the grantees cover both urban and rural areas, participants' needs vary widely and these grantees usually attempt to provide a full range of services to meet those needs. Related to geographic size is the distance participants must travel to receive services.

Although satellite JTPA offices are set up to accommodate participants, the greatest issue appears to be transportation to attend Classroom Training services and work-site placements at some distance from their homes. Related to this issue is the understandable desire of participants to remain close to their families and communities.

5) Existence of Other Programs/Services - Eleven programs specifically mentioned the existence of other social and educational services as a factor influencing their service priorities. At least nine grantees noted that social service needs such as child care, health and transportation were met by other funded programs, such as the tribal Indian Health Service and child care programs provided by the tribe or by JOBS, Head Start and other programs. Most significant were the references made by six grantees regarding the existence of basic skills educational programs funded by the Bureau of Indian Affairs (tribal programs) or by local community colleges and voc-tech schools. Where it is feasible and accessible, INA 401 grantees tend to make referrals to other programs for GED/ABE training. When funding decisions force reductions in services, the availability of these other services/programs influences reduction or elimination of basic skills classroom training in some INA 401 programs. However, since serving high school dropouts is a stated priority for many grantees, a concerted effort should be made to ensure that all participants are proficient in basic educational skills as a foundation for long-term employability.

6) High Dropout Rates/Education Resources - Related to the above are the eight instances cited by grantees of the existence of high dropout rates among their targeted population as a factor determining their service design. In one instance, the public schools were described as ineffective for the Indian students who attended them; in another the high school had closed, leaving students with undeveloped basic educational skills or without diplomas. Certainly this is a serious factor given the current push for educational reform throughout the country. Perhaps INA 401 programs can join with tribal education departments, other federally funded programs with education components, states, public schools, community businesses, and other agencies to address this problem - to ensure the foundation is there for employability and a higher quality of life. Happily, one tribal grantee was able to cite a high graduation rate as a principal factor, allowing service priorities to focus on higher education, Occupational Skills Classroom Training, and employment placement.

Related to educational training is the existence or lack of adequate service providers for Occupational Skills Classroom Training, as was made clear from the results of the Administrator Survey presented in the previous chapter. Six site-visit grantees noted that this was a determining factor. While the majority could access provider campuses, in a few instances OSCRT was not a viable service priority because there were no facilities within a reasonable proximity to the service area.

7) Miscellaneous Factors - This category includes factors mentioned only infrequently. One grantee stated that the Department of Labor's emphasis on long-term goals for participants guided its priorities and another stated that welfare reform was a factor. In reality, DOL's encouragement of long term solutions probably is an influence in more than one grantee's design and the full impact of welfare reform has yet to be realized in the INA 401 programs.

Specific Service Emphasis

To get a general picture of which services are emphasized, we can look at the participant levels in the various services and at the percentages of costs allocated to the services by the INA grantees. It is useful to look at these distributions in terms of percentages rather than absolute numbers, to get a better sense of service emphasis adjusted for program size.

Which services are most emphasized in INA 401 programs? According to PY 96 data, very clearly the Training Assistance and Work Experience services are the two, which INA 401 grantees utilize most frequently and under which the greatest percentages of participants are serviced. Training Assistance is a service provided by all grantees in our sample. Likewise, Work Experience is included in the services of all grantees sampled. Closely following these two top priorities is Occupational Skills Classroom Training, a service option included in all but one of our sampled twenty-three sites. Community Service Employment is the third most utilized option, with sixteen grantees indicating participation, and On-The-Job Training is the fourth with fourteen grantees exercising this option. Basic Skills Classroom Training is utilized by thirteen of our sampled sites, making it the least utilized. However, since over half of the INA 401 programs did indicate participants in this service, it is a significant part of the service design overall. The chart below indicates the range of percents of participants in each of the six education and training services:

Range of Percents of Participants PY 96

	Low %	High %
Basic Skills CRT	3.2	42
Occupational Skills CRT	.8	70
On-The-Job Training	.3	20
Work Experience	1.2	69
Community Service Employment	1.5	21
Training Assistance	1.2	95

Training Assistance. Noticeably, the range across all programs is widespread but we again see that the highest percentage of participants is found in Training Assistance, where one grantee serves 95% of its participants through this service. Understandably, this can mean many different things. Since some grantees include intake procedures, counseling and case management as well as special work readiness classes, testing and attendant supportive services under the umbrella of Training Assistance, this category can encompass many different things. In five sites over 50% participation is cited, and in eight sites the participant percentage is over 33%.

These statistics simply underline that Training Assistance, a service which is usually one-on-one, which is usually short-term in nature, and which is more designed for short-term goal attainment, is one of the primary services of choice. Training Assistance is rarely confounded by transportation problems, as are some other employment and educational services, and, for the most part, does not have to rely on the cooperation or extensive coordination with other agencies. It is through Training Assistance that participants are generally introduced to the "world of work" or reeducated to the economic climate of the community, urban, rural or tribal. It is through Training Assistance that clients are helped to make transitions from one culture to another and to learn how to set their educational and occupational goals; it is also through this service that life and survival skills training surfaces—all basic to employability.

To further broaden the concept, Supportive Services, in the form of shelter, meals, childcare, mileage, clothing, tools, medical, job search assistance, utilities, and stipends, frequently accompany Training Assistance, either in the form of financial assistance or referrals to other programs/agencies. It is easy to understand why T/A is one of the most favored options. Do we conclude that employment then is the most important factor driving the design of INA 401 programs? Perhaps.

Work Experience (WEX). This is another top priority for INA 401 programs, with two grantees indicating 59% of costs allocated to WEX and other PY 96 data showing that one grantee has 69% of its rather large participant base in WEX. Over half (13) of the sampled sites indicate that over ¼ of their participants are in WEX, with three grantees indicating more than ½ of their participant base is WEX. WEX is the first or second top option for half the sampled sites.

Work Experience, as a service, is perceived by grantees as having several positive factors, which make it a priority service for the grantee, and for the clients. Among those are: 1) it does not require a long term commitment from either the participant or the employer, 2) placements can be made wherever there is a willing employer, either tribal, public, or not-for-profit, 3) placements are, more often than not, entry level, requiring less pre-service education or training, and participants are more easily placed, 4) participants sometimes recycle, entering and terminating WEX more than once or terminating WEX prior to entry into Community Service Employment or other services, and 5) it is a source of low-cost labor for the tribe, enabling tribes to provide services to their communities that they could not otherwise afford. Again, the utilization of WEX is another way to "provide as many services to as many as possible". While WEX is a "training" program it is just as much perceived as an "employment" program. Combine Work Experience participation with Training Assistance participation and yes, we are able to ascertain a priority given to employment - not in opposition to training or education but rather a greater emphasis or desire to place participants in a position to "earn a living" as quickly as their needs indicate. Sometimes this sacrifices a long-term goal for educational attainment, sometimes not.

Occupational Skills Classroom Training (OSCRT). This is the third most utilized service based upon sampled grantees who opt to provide this service; twenty-one of the twenty-three study sites showed participation in OSCRT during PY '96. However the number of participants is somewhat lower than in WEX and TA services, with nine grantees placing up to one-fourth of their participants in this service. One grantee, a voc-tech institution, indicates 70% of participants in classroom training. At the low end, one grantee had. 8% of its participants enrolled in OSCRT. This emphasis is congruent with long term employability and skills enhancement and it is heartening that grantees generally do place priority on OSCRT. Limited enrollment is said to be contained by the higher cost of OSCRT matriculation. Costs allocated ranged from 3% of INA 401 budgets upwards to 44% in PY '96. This cost data combines both OSCRT and Basic Skills CRT and is, therefore, not a discrete measurement.

Community Service Employment (CSE). Community Service Employment is somewhat of a bridge between Work Experience and unsubsidized employment in a positive scenario. Placements in the not-for-profit sector seem to be one viable alternative to the problems cited with the private sector (or for-profit sector). Along with Work Experience placements, it allows grantee organizations to place participants while also improving or adding to the work force of the tribal or organizational grantee, particularly the tribal grantees. One grantee sees its programs as another way of "improving the capability of the nation". CSE is the service that is fourth among priorities, being offered in sixteen of the twenty-three grantee sites.

Conversely, fewer participants are placed in CSE overall than in TA, WEX or OSCRT. Where the service is provided, less than one-fourth of participants are placed in CSE throughout the sampled sites. Participant data in PY '96 indicates a low end of percent of participants at 1.5% in an urban setting and a high end of 21% of participants in a large multi-state tribal setting. CSE is one of the services eliminated or lessened when budget cuts occur, because the salary costs are somewhat greater and the job skills required tend to be more stringent than WEX. Another factor is the budget cap placed on CSE, making it a less flexible option. Costs allocated to this service range from .5% at a voc-ed facility to 60% of the budget of a rural tribal grantee.

On-The-Job Training (OJT). This is the fifth service priority based upon participation data for PY 96. Fourteen sampled grantees provided this training and employment service. There are fewer participants overall than in any other service, however, and the lowest range of participation. The lowest percent of participation is .3% in an urban organizational program with the highest percentage of participants reported at 20% in a statewide combined urban and rural tribal program. According to interviewees, there are multiple problems with OJT providers in the private sector, which have been previously discussed. It appears as though service providers are hesitant to commit to hiring participants in full-time positions after the subsidized training period has ended. The other prevalent factor is the shortage of employment opportunities in underdeveloped regions, particularly in isolated, rural service areas. Because of the multiple confounding factors, OJT is another of the services that are eliminated or cut back when INA 401 funds diminish. PY 96 cost data indicate lower percents of costs are allocated for this service, with the low end of .3% of funds allocated at a large multi-state rural tribal program to the high end of 24% of funds at an organizational state-wide program.

Basic Skills Classroom Training (BSCRT). Lowest in service priorities, based on PY 96 participant data, is training for basic skills, including GED and ABE training. Thirteen of the twenty-three sites provide this service through a variety of service providers: community colleges, voc-tech schools, high schools, alternative schools and grantee on-site classrooms. This service is one where the quality of services fluctuates based on funding levels, on the qualifications of instructors, on teaching methods and materials, and on other services or lack of them. While some programs require participants to have diplomas/GEDs or score at age/grade reading and math levels before enrollment, it is not a uniform practice. The existence of other sources of funds and other basic skills programs allows some grantees to refer participants out rather than provide the service through the INA 401 program. Coincidentally, many participants who are dropouts or lack basic skills constitute a significant portion of the JTPA client base. Conversely only two grantees report significant participation percentages in this activity, of 25% - 33%. Along with OJT and CSE, percentages of BSCRT participants overall are lower than TA, WEX, and OSCRT, with the low range at 3.2% participating in an urban program and 42% participating in an isolated rural tribal program.

Summary

In summary there are multiple external and internal factors which determine how INA 401 grantees design and deliver services. No two sites are identical or have identical priorities. As economies, labor markets, funding, organizational and tribal priorities, and clients needs and goals differ, so do the services.

V. SERVICES IN SUPPORT OF TRAINING

This chapter describes activities and services related to selecting clients and supporting them during training. These activities include targeting, outreach and recruitment, intake and assessment, and case management and supportive services. Our goal for this chapter is to describe strategies used by case study grantees to support participants while in training and examine whether the design and implementation of these activities are consistent with the model of high-quality training.

As discussed in earlier chapters, the Indian and Native American population eligible for the Section 401 program is tremendously diverse, as are their needs for services. Our model of responsive services depicted in Chapter I suggests that activities in support of training should be tailored to the circumstances of the local context and support the unique needs of participants and communities. According to this model, program quality can be enhanced if grantees: (1) devise and implement strategies to reach the target population, and (2) review the service needs among eligible participants and assess their own program's and other agencies' service capabilities to meet those needs. Such efforts can ensure that programs develop service strategies that take into account their clients' special circumstances while also avoiding a duplication of services.

Below we discuss strategies and practices that case study grantees implemented to support the development of high-quality, responsive activities and services that directly impact decisions about service delivery. We also highlight the challenges grantees face in promoting activities intended to support participants, and the strategies developed to address those challenges.

TARGETING PARTICIPANTS

Because the need for Section 401 services far outweighs the grantees' capacity, some grantees identify specific target groups for employment and training services. Identifying a priority group for services can be important because most grantees, due to their limited program budgets, can often use their resources most efficiently and effectively when focusing attention on certain types of clients over others. Moreover, developing targeting goals and effective outreach mechanisms can promote equitable access to services for all members of the Indian and Native American community, particular those living in remote areas.

One of the first decisions some grantees make, therefore, is to determine who among the eligible applicants is enrolled for services. These decisions are often difficult. In every program, grantee staff reported that their eligible population consists of youth and adults, high school graduates and dropouts, and those with some or no previous work experience. When asked about targeting decisions, grantee staff insisted that all eligible Indians and Native Americans in their local communities were by definition disadvantaged and in need of services.[1] Grantees therefore tended to recruit widely to meet the needs of any potential INA participant who sought services. Moreover, there is a strong ethic among Native American social service agencies that no one should be turned away who needs services.

Despite these facts, some grantees identified several segments of the eligible population that they were particularly interested in reaching and for whom they felt JTPA services were most appropriate. Decisions about which groups to target were generally made because grantees strongly believed that JTPA services would have the most impact when offered to certain types of participants over others, and they believed that program resources were better suited to meet some needs over others.

Based on participant file reviews and discussions with program staff and participants, we learned that, of those case study grantees who mentioned targeting, two key groups for employment and training services were identified: (1) the hard-to-serve, and (2) participants with specific characteristics.

Targeting Hard-to-Serve Participants

Some grantees explicitly targeted hard-to-serve groups because they believed that this subset of the population was most in need of services and a group for whom services could have the most impact. Grantees identified persons deemed hard-to-serve as those with limited employment skills or education, or who are basic skills deficient, homeless, or at-risk youth. Others believed that all members of the eligible population were hard-to-serve and they thus had difficulty serving one group over another. To address this challenge, some grantees identified participants considered "most in need" by developing specific strategies for recruitment or enrollment. Some, for example, established a "no repeaters" policy that would give preference to eligible participants seeking JTPA services for the first time. Other grantees identified the most in need by soliciting referrals from human service agencies that serve hard-to-serve individuals, including, for example, homeless shelters, foster homes, and agencies providing mental health services for persons facing life challenges. Because of the challenge of identifying a hard-to-serve group, others resorted to enrolling individuals on a "first come, first served" basis and served as many people as program resources would allow.

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[1] According to JTPA Section 401 regulations, eligible participants include those who are Indian, Native Alaskan, or Native Hawaiian as determined by the grantee, and who are economically disadvantaged or unemployed or underemployed.

Among grantees that identified hard-to-serve target groups, there was a moderate disparity between their targeting goals and the types of participants served. For example, several grantees, because they wanted to ensure a positive termination, served a large number of participants who already had some college education and a solid employment history. Although some of these participants may have required a skills upgrade to be competitive in the labor force, they were sometimes served first before participants identified as hard-to-serve.

Targeting Participants with Specific Characteristics

Some grantees targeted participants with specific characteristics, including possession of occupational skills that were in demand in the local economy, youth participants, and motivated participants. The decision to target these groups was made because grantees believed that these groups would most benefit from specific service activities over other groups. The grantees' decision was strongly influenced by several factors, including limited program resources and employer demands, particularly in local sites that emphasized the provision of subsidized employment activities.

Specific circumstances that led grantees to identify target groups varied widely. Several grantees designed their programs with an emphasis on specific service activities, such as Work Experience or classroom training, and operated under the premise that they would serve certain groups that could enroll in these activities. Some grantees enrolled participants with limited employment skills and work experience so that they could participate in subsidized opportunities designed for entry-level workers. In another case, a grantee that emphasizes Work Experience in a day care center targets primarily women caregivers. Similarly, grantees that offer primarily classroom training activities target either high school dropouts or high school graduates who are interested in post-secondary education.

Several grantees reported that they explicitly target "motivated" participants whom they felt would succeed in the JTPA program. For example, one grantee who faced high attrition in its service activities in the past tried to identify participants who appeared motivated. Accordingly, it eschews on-the-spot enrollments and instead developed a system to send reminder notices to interested applicants to attend an orientation session. Applicants who fail to show up after two notices are assumed to be poorly motivated and would not be enrolled. This grantee felt that this newly devised system would help address the problem it was having with high attrition.

In general, grantees that established specific targeting goals strongly believe that identifying a priority group was beneficial for the participants and the worksites or service providers, because then the needs of both would be met.

OUTREACH AND RECRUITING STRATEGIES

Our model of responsive services suggests that programs can be effective in ensuring equitable access by developing outreach and recruitment procedures consistent with targeting goals. However, nearly all grantees reported that, because of the high demand for JTPA services, they did not need to aggressively recruit to fill available slots. Participant outreach and recruitment was therefore not given a high priority in a large number of case study grantees. Instead, our sampled grantees relied heavily on indirect recruiting practices to make clients aware of Section 401 services, although some used more direct, proactive methods. We describe these methods below.

Indirect Recruiting

The first approach—indirect recruiting—constitutes the primary method cited by sampled grantees. This approach requires minimal effort by the grantees to reach potential participants and can be viewed as a "passive" recruitment strategy. Indirect recruiting typically consists of the following:

- *Word of mouth referrals*, or the use of the "moccasin telegraph" whereby current or former Section 401 participants notify their friends or relatives about services and encourage them to enroll.
- *Referrals from other community agencies*, including community colleges, tribal agencies, social service agencies, and other employment and training systems, such as Employment Service.
- *Distribution of program information to community agencies* to encourage referrals and increase the community's awareness of services provided through Section 401 programs.

Word-of-mouth referrals. The most prominent method of drawing clients to JTPA services was through word-of-mouth referrals. Most grantees, especially tribal grantees, reported they use this method as the primary recruitment mechanism and felt that this method, over others, was very effective because of the close-knit relationships established within INA communities. Grantees reported that their long history of providing services, along with the reputation they had established, further facilitated word-of-mouth referrals. The vast majority of participants interviewed also indicated that word-of-mouth referrals were the primary means by which they became aware of Section 401 services.

The advantage to relying primarily on this recruiting method is that it requires little or no supplemental financial or staff effort to reach participants and it almost always yields an adequate flow of clients seeking services. The main disadvantage to this recruiting approach, however, is that some potential enrollees who are desirous of services but are not well connected to the community's social network may be unaware of the program and hence will be essentially precluded from participating. For example, several participants mentioned to us during our site visits that they had learned about the program from a friend or relative and found it to be very helpful, but wished they had known about it years before; they wondered why the program didn't advertise more. Similarly, participants living in remote areas may also be disconnected from the service stream.

Referrals from agencies. Another indirect recruiting method practiced by sampled grantees is to solicit participant referrals from local community agencies and employers. Half of our case study grantees generated referrals by using their relationships with employers, schools and colleges, and a variety of tribal and non-tribal agencies providing social, educational, health, and family services. Referrals from these agencies are viewed as an indirect recruiting practice because relationships with them can lead to a steady client flow with little supplemental effort by grantees.

Referral linkages with agencies are often established informally—grantee staff typically rely on personal relationships between tribal and non-tribal agencies to develop and maintain linkages. Some case study grantees developed mechanisms to sustain institutional linkages by holding formal weekly or quarterly meetings with other community-based organizations and service providers to promote informational exchange and cross-agency collaboration. One grantee with limited funds sought creative ways to extend its recruitment activities by getting involved in a variety of community groups and committees to inform the staff of other programs and agencies about the JTPA program.

A number of grantees also developed linkages with employers to facilitate participant referrals. Strong working relationships with employers enabled grantees to identify job openings for training in subsidized employment and increased referrals from employers. Although linkages with employers proved valuable in the long run to grantees and participants, our respondents admitted that participants recruited through this mechanism often could have found employment without the assistance of JTPA.

Distribution of program materials. Grantees also developed marketing strategies to reach a wide audience and made a concerted effort to distribute information about JTPA services to a wide range of agencies and service providers, including employers, social and health service providers, and training providers. Grantees typically placed brochures, flyers, and posters in schools, community colleges, and social service agencies.

Direct Recruiting

Some grantees also practiced direct recruiting strategies by using "active" methods—those that require substantial resources, including staff time and program funds to reach potential participants. Examples of direct recruiting activities practiced by case study grantees included: (1) advertisements through the local media, (2) presentations to key staff at community-based organizations, (3) establishing satellite offices dispersed throughout the service area, and (4) sponsoring community-wide activities to promote JTPA services.

Advertisements through the media. Many grantees, particularly large grantees operating in large service areas, recruit participants by advertising through the local media. This recruitment method is considered active because it requires the commitment of extra resources. Most grantees advertise in Indian newspapers and newsletters, while some grantees went further by making appearances on television and radio talk shows, and making public service announcements on the radio and television. These ads encouraged participants to call or visit the JTPA offices for more information. Advertising in the local media was generally used sparingly, however, because of the high cost of advertising.

Other advertising activities included developing videos and accompanying publications to distribute to participants and employers in local agencies located throughout the INA communities.

Staff presentations. A large number of grantees practiced direct recruitment by making presentations to staff in local agencies. Grantee staff conducted presentations at community meetings, job fairs, community-based organizations, and schools to disseminate program materials and publicize JTPA services.

Satellite offices. At least seven grantees in our sample, who served large and geographically diverse areas, maintain field offices to conduct outreach to potential participants. Maintaining field offices, case study grantees find, supports their efforts to recruit a broad spectrum of participants while ensuring that members of the Indian and Native American community have convenient access to services. For example, one grantee outstations its staff in a low-income area inside a housing complex once a month to facilitate participant recruitment.

A number of grantees established other innovative strategies to inform the community about JTPA services. In several rural and urban sites, grantees outstation staff in colleges and in other network agencies on a weekly basis to reach potential participants. Some grantees conduct intake activities away from the JTPA office to make it easier for participants to enroll for services. Staff from several grantees visit the homes of clients to promote program services. Another grantee serving 41 counties located in rural, suburban, and urban communities requires staff to travel throughout the service areas to reach clients. Some grantees also try to make it convenient for clients by accepting collect calls from potential participants inquiring about services.

Community-wide activities. Many case study grantees promote JTPA services by sponsoring community-wide events such as POW-WOWs and job fairs that attract a large number of individuals from the community. One grantee sponsors job fairs twice a year to recruit participants and to make employers aware of JTPA services.

Limitations Influencing Participant Recruitment

Several important factors limited the grantees' ability to effectively recruit and reach potential participants. These factors include the following:

- *Limited program and human resources affected* grantees' ability to conduct extensive recruiting activities. Due to limited budgets, most grantees are unable to devote very many resources to recruitment.

Because most grantees already have more than ample case loads, more extensive recruitment is in any case felt to be unnecessary and a waste of resources.

- *The large service area*, particularly for tribal grantees, inhibited grantees from conducting extensive participant recruitment. Although some grantees expended resources to establish field offices and advertise through the local media to reach participants, grantees with limited program funds were unable to effectively recruit participants dispersed throughout the service area. By implication, some potential clients are unintentionally denied access to services.

In short, grantees used a variety of outreach and recruitment methods to reach potential participants. These methods generally appear to be very effective for their particular areas, but some strategies had certain disadvantages. The challenge, reported a number of grantees, was to develop appropriate outreach strategies that could effectively reach a large number of clients given the limited resources available.

INTAKE AND ASSESSMENT

After participants are recruited for services, they undergo the intake and assessment process, which is an initial step towards the development of individual service plans. Consistent with the model of responsive services detailed in Chapter I, grantees should develop procedures for intake and assessment activities that will identify participants' strengths and weaknesses in order to inform the service planning process. As described below, intake and assessment services vary significantly across case study grantees and, for the most part, these activities are practiced informally.

Intake Activities

Applicants seeking services through Section 401 programs undergo an intake process, which typically includes (1) an orientation to services, (2) eligibility determination, and (3) the completion of an intake application. Many grantees integrate these activities to obtain client information and to make efficient use of applicants' time spent at the JTPA office.

Orientation activities typically consist of an overview of services and eligibility requirements. Five case study grantees offer a formal group orientation to services. One grantee views the orientation process as an integral part of career planning and provides a six-hour orientation session that includes eligibility determination, self assessment, and an overview of community resources through presentations by social service representatives from the local community.

As part of the intake process, grantees developed intake applications that solicit basic demographic data, educational and employment background, employment and educational goals, and supportive service needs. Two case study sites providing an array of educational and social services developed a "common intake form" to simplify access to multiple services offered by the grantee and the JTPA program enrollment process.

As part of the intake process, participants meet with the intake counselor or case manager, who collects the necessary information and paperwork from participants to determine eligibility for services. Respondents reported difficult challenges in collecting eligibility documents from potential participants and expressed concern over the burdensome nature of collecting documents and filling out forms. Respondents reported that many applicants were turned away for services because they were unable to demonstrate their Indian ancestry.

Once the intake was completed, information collected from the intake application functioned as a starting point for the assessment of services.

Assessment Activities

The next step to understanding the service needs of clients is to conduct an assessment of the clients' skills, interests, and service needs. Section 401 programs are exempt from the statutory requirements in JTPA's Title II to conduct an "objective assessment" of all clients, and grantees thus have ample discretion in designing assessment activities to meet the particular needs of the Indian and Native American community.

A key feature of our model of responsive services suggests that assessment of participants' skills, interests, and needs should be tailored to the participants' unique backgrounds and circumstances. Understanding the service needs of participants is especially critical in Section 401 programs because individuals seeking services present diverse needs and career interests. According to respondents, many participants suffer from low self-esteem, substance abuse, lack of employment skills, lack of knowledge about the world of work, and other life challenges. Identifying these barriers through assessment is critical. Similarly, clients seek services often with well-defined objectives in mind, from undergoing long-term post-secondary education to receiving an immediate job referral. Grantees must therefore adapt the assessment process in ways that are useful and practical for the clients. Below we discuss the areas and methods of assessment and the arrangement grantees make for conducting assessment activities.

Areas and Methods of Assessment

All Section 401 grantees conduct some form of assessment of participants' service needs and assess for a variety of personal characteristics, including the following:

- Basic skills proficiency
- Aptitudes
- Interests
- Supportive service needs

Nationally, data from the grantee survey, as presented in Chapter III, revealed that most grantees conduct assessment in a variety of areas for all or most clients—76% of grantees assess for reading skills, 60% assess for math skills, and 69% assess for life skills. Nearly all survey respondents assess for barriers to participation in training or employment (97%) and previous work experience (96%), while 85% assess for occupational interests.

Assessing for **basic skills** (reading and math) proficiency occurs in the majority of the case study grantees as well. Sampled case study grantees reported that basic skills assessment is provided either on-site or through a provider, most commonly using the Test of Adult Basic Education (TABE), the Comprehensive Adult Student Assessment System (CASAS), or the Job Corps test.[2] However, not all clients are necessarily tested. For example, many grantees provide the option of not testing for basic skills if participants are currently attending or have attended college or if they are interested in just receiving direct placement assistance.

Many grantees assess participants' **aptitudes** in a variety of occupational skills, including, for example, motor skills, spatial reasoning, and typing speed using formal, commercially-developed tests or self reports. Assessing for proficiency in specific aptitudes was typically reserved for subsidized employment activities to better understand participants' skill levels.

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[2] One grantee from our sample reported that some commercially developed basic skills tests are culturally biased against Indians and Native Americans and its staff are therefore seeking alternative methods to test for basic skill levels.

Understanding participants' occupational **interests** is another goal of assessment reported by some grantees. About half of case study sites conducted a career interest inventory to gauge participants' occupational and career interests and used formal paper and pencil tests such as the Career Occupational Preference System (COPS), self-reports, the intake application, and informal interviews with grantee staff. A number of case study grantees also measure participants' values in an effort to understand the "whole" person.

The majority of grantees directly provide some form of supportive services and almost all of case study grantees assess for **supportive service needs**. All grantees emphasized that many participants face substantial barriers to employment, (e.g. lack of housing, lack of childcare) that must be addressed to be successful in the Section 401 JTPA program. As such, understanding the scope of participants' supportive service needs informed the development of practical and appropriate service planning strategies to support participants during training.

Grantees assess for several types of supportive service needs, including:

- Sustenance needs such as transportation, housing, nutritional and other training-related needs.
- Logistical needs, such as arrangements for childcare and transportation to attend training.
- Personal needs, such as health related needs, substance abuse counseling, and other emotional needs.

Nearly all grantees assessing for supportive service needs use informal methods, including informal interviews, self-reported information on the intake application, and observations conducted by grantee staff. In one case however, the grantee developed a formal procedure to assess supportive service needs by using an internally developed form called a "Financial Needs Analysis Form." This one-page document lists expense categories and participants' total monthly costs on one side and their total monthly resources on another side. This information helps the participants and grantee understand the participants' financial situation and enables grantee staff to determine which participants are in most need of supportive services.

Overall, we found that the majority of grantees practiced responsive assessment services by tailoring assessment activities appropriately, depending on the clients' interests and employment goals. For example, a number of grantees provide assessment testing to individuals with specific characteristics, including those lacking a high school diploma or those whose interest in specific service activities require assessment testing in reading and/or math. One grantee paid particular attention to the experiences of its participants by not testing "older" applicants who "would be offended" if they had to be tested in order to enroll in specific services.

The challenge that most sampled grantees face, however, is effectively interpreting assessment results to inform participants' service planning strategy. Indeed, even grantees with well-developed assessment procedures face difficulty linking assessment results to participants' service strategies, as will be discussed shortly.

Arrangements for Assessment Activities

Assessment services are provided by either grantees or local service providers. Five out of 23 case study grantees, or 22%, contract assessment services to community-based entities such as community colleges and employment and training systems such as Job Service. Assessment providers typically assess for basic skills proficiency and career interests using a standard battery of paper and pencil tests. The remainder of the sampled case study grantees conducted assessment in-house.

The majority of case study sites thus conduct their own assessment activities. Typically, intake staff and case managers document participants' educational and employment barriers, occupational and training interests, career goals, and supportive service needs using commercially developed paper pencil tests and customized intake applications, informal interviews, and observations by grantee staff. One grantee developed an extensive, 14-page intake application to solicit information about participants' work history, and educational and career goals, in addition to information on participants' financial and family situations.

As noted, some grantees make arrangements with outside providers to conduct assessment. This method reportedly made a difference in decreasing the grantee staff's workload and helped solidify linkages with community agencies. This arrangement also addressed the lack of human resource capacity that some grantees faced to effectively conduct assessment. To avoid a duplication of services, some grantees divided up the assessment responsibility. For example, some grantees assess for occupational interests, while the service providers assess for basic skills and aptitudes. In some cases, additional assessment of participants' educational levels and work maturity are conducted at the service provider level so they can tailor instruction and training to participants' specific needs.

SERVICE PLANNING

After assessment, participants meet with a counselor to begin the process of service planning—a process in which participants and grantee staff should be jointly involved in establishing participants' short-term and long-term career goals. As emphasized in the model of responsive services, the individualized service planning process should be carefully crafted to ensure that applicants receive services that are most appropriate to their individual circumstances as determined by assessment results and that goals are jointly established between the staff and the applicants. In general, when making decisions about service planning, grantees adhered to these principles. Additional factors that were considered included the availability of services and service providers, and in many cases, transportation challenges and labor market options.

All case study grantees developed a formal document to facilitate and document service planning—commonly called the Employment Development Plan (EDP)—a document that describes participants' barriers to training and employment, educational and career goals, and service activities to support those goals. Similar to other DOL-funded employment and training programs, the EDP is intended to serve as a strategic service-planning document that records participants' progress, and their service needs, and should be updated as participants move through the program.

Although all case study grantees developed an EDP as a way to initiate the service planning process, the amount of guidance received during service planning varied considerably. We learned that, while most grantee staff were careful about matching participants to service activities consistent with their interests, few programs established direct procedures to help clients decide on a career path or direction through the use of assessment results. Program staff reported that, often, clients visit JTPA offices with a clear idea of a service activity, most commonly, job placement or a specific training program in mind. Several programs reported that clients often want to enroll in subsidized employment opportunities only, even though grantee staff acknowledged that their assessment results and employment needs suggest a different activity.

Grantees were often constrained by several factors in developing responsive service planning strategies, including participants' interests in employment only and their immediate need for income. Because of these constraints, many grantees often failed to develop service plans that addressed long-term employment needs of participants and, instead, opted for immediate solutions to "help out" participants, which often involved placement in subsidized employment for varying periods of time. During site visits, we observed that participants were assigned to subsidized employment opportunities even when they tested to be basic skills deficient.

Despite challenges that many sampled grantees face, we discovered several examples in which the EDP and service planning process was inventive and well developed. These examples are presented below.

> Some case study grantees made service planning decisions based on individual life experiences, including participants' educational and employment history. Eight grantees considered participants' basic skills test results when developing the service plan and referred participants to basic skills and GED service providers based on the need identified in assessment results. Although a number of participants did not attend basic skills training, the grantee staff encouraged participants to attend.
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> One grantee uses several staff members to conduct individual assessment. Each staff member assesses for a variety of needs, including financial and supportive service needs, health needs, and other personal needs. Staff members share information on each potential participant and make recommendations on "next steps" to achieve service goals. Typically, counselors make note of health needs, such as counseling for substance abuse, and refer participants to an in-house substance abuse counselor prior to receiving services.
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> The service planning process in three case study sites was facilitated by participants, many of whom were already enrolled as students in a local college or university and sought JTPA services to support them during training. These participants already knew what services they wanted and program staff reviewed their profiles and assigned them to activities that interested them, after the staff assessed their needs.

Factors Influencing Service Planning

Discussions with a number of respondents and a review of participant files revealed that several factors influence the development of individualized service plans and the match to services. Consistent with the results from the Administrator Survey (see Table III-12 in Chapter III), these factors include (1) geographic challenges, (2) the availability of service providers, (3) participants' interests, (4) assessment results, (5) funding constraints, and (6) statutory restrictions on the use of funds.

- *Transportation challenges.* In the majority of our case study grantees, transportation concerns represented a key factor in providing the services outlined in the individual service plan. Participants are sometimes assigned to services in their residential vicinity and matched to worksites or other service providers that are closest to their homes, even if the service activities are not fully consistent with their longer-term career goals.

- *Availability of service providers.* The availability of service providers is another important influence on deciding the types of services participants will receive. In some areas, limited service providers meant that participants are not offered a menu of services, but only the narrower range of services that are available.
- *Participants' interests.* Although participants' interests were not always the driving force (see the results from the Administrator Survey), the individual service strategy was heavily influenced by the participants' own expressed preferences.
- *Assessment results.* For many grantees, assessment results are used to identify employment barriers, and grantee staff view assessment results as important to the development of the service plan. These grantees typically rely on results from basic skills tests to determine participants' skill levels and subsequently make referrals to basic skills service providers as needed. Some case study grantees even establish a policy stipulating that participants deemed basic skills deficient must attend basic skills remediation or GED classes prior to receiving additional services. The majority of case study grantees, however, do not rely primarily on assessment results when developing the service plan.
- *Funding constraints.* Under this heading we include both the grantees' own budgets, which limit the types of services that can be provided and the duration of training, and the participants' budget constraints, which often make it difficult for them to undergo long-term training in the absence of a steady source of income.
- *Restrictions on the use of funds.* Although JTPA allows wide discretion on the types of services that can be provided, there are some statutory or regulatory restrictions on how funds can be used, such as restrictions on the length of OJT.

Overall, we found only a few examples in which service planning was responsive to the long-term training needs of participants. Several factors and concerns, most notably participants' stated interest in gaining immediate employment and limited service options, impacted the effectiveness service planning.

CASE MANAGEMENT SERVICES

Once individual service plans are developed, they need to be effectively carried out through case management. Case managers track and support participants while they progress through their planned service activities and can function as advocates for participants during training and help them address their skill deficits by brokering for resources and supportive services within the community. Below we discuss how the 23 case study grantees practiced case management and highlight the staffing arrangements for case management, the frequency of contact between case managers and participants, and the level of intensity of case management activities.

Staffing Arrangements for Case Management

Providing support and advocacy for participants during training is a critical component to our model of responsive services. The 23 sampled grantees varied in their approaches to staffing case managers. In the majority of cases, individual case managers are assigned to manage a caseload of participants, while a small portion of grantees practiced a team approach to managing participants. The majority of sampled grantees reported that staffing shortages greatly influenced staffing patterns.

In five case study sites, several staff members—consisting of intake staff and job developers—work together and share client information to help monitor participants' progress and support them in overcoming difficulties encountered while in training. In two of these grantees, the entire JTPA staff with overlapping roles in intake and job development all function as case managers and provide ongoing assistance and intervention to help participants tap into community resources and address their personal needs (e.g. housing, child care). In two other programs, the JTPA and service provider staff jointly, including employers and instructors, oversee the participants' progress and help each other identify potential barriers participants may face during training. For example, in one site, an employer frequently visits grantee staff to provide updates on participants' progress, while grantee staff follow up on the employers' feedback by contacting the participants directly to gather information about their needs. The remaining grantee of these five conducts regularly scheduled "tracking" meetings with a team of case managers to solicit information about client progress and follow up on referrals made to agencies providing services. Two grantees switched from a one-on-one case management approach to a team approach to reduce the level of "hand holding" to encourage participants to be self-sufficient.

The remaining 18 sampled grantees assigned one staff member to provide one-on-one case management to a caseload of participants. These grantees typically start case management activities at intake and continue to monitor and track participants as they progress through training.

Intensity of Case Management

In general, the intensity of case management activities varied significantly. Case study grantee staff indicated that because they enroll a large percentage of "hard to-serve" participants, case management services need to be highly individualized and the level of intensity should be appropriate for each participants' life circumstances and service activities. A strategy that most grantees commonly used is to vary the frequency and intensity of case management activities on the basis of:

- *The types of participants served.* Some grantees target intensive case management services to persons experiencing severe hardships, including those who are substance abusers, former offenders, or in need of medical attention, and they meet less frequently with participants who are progressing well. According to respondents, this strategy ensures that case management services are tailored to the needs of individual participants and are used with the greatest efficiency.
- *The types of services provided.* A large majority of grantees tailor the intensity of case management to the activities in which participants are enrolled. For example, some grantee staff visit participants enrolled in work experience more often than those enrolled in occupational skills training. Conversely, one site provides more intensive case management to participants enrolled in occupational skills training than those enrolled in work experience. Several other grantees provide least intensive case management to participants seeking financial support while enrolled in a college program. Targeting case management services can promote the efficient use of staff resources; however, we suggest grantees use this approach with caution, as many participants may inadvertently not receive adequate case management when needed.
- *The stage of program enrollment.* Several grantees provide intensive case management at the beginning of program enrollment or towards the end of the program, depending on the type of service activities in which participants are enrolled. For example, two grantees provide intensive case management early in program enrollment until grantee staff establish a good rapport with the participants and assure themselves that the client is progressing well.

In the majority of grantees, the types of case management activities included administrative tasks such as reviewing and collecting timesheets for subsidized employment, monitoring attendance records, and distributing student checks for work-related training. Although most grantee staff were expected to visit participants in their classrooms and worksites weekly or monthly, a number of grantees do not enforce this policy. However, some case managers informally "check on" participants "to see how they were doing" and, when necessary, seek additional resources to address problems that arise.

We found many examples in which case managers were caring and dedicated and instances in which case management activities were carefully planned and well executed. Some examples are highlighted below.

> At one grantee, case management services are considered a key component to service delivery and grantee staff often go beyond the call of duty to provide client support. The case managers spend the bulk of their time gathering information about different programs and funding streams that would enable clients to take advantage of other opportunities. One participant had to move in with relatives in order to avoid what would have become a formidable transportation challenge. However, the house was already very crowded. The case manager found a housing option through the end of training "just in case" the participant would have to move.
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> This same grantee is able to work jointly with staff at the service provider level to provide responsive case management. A case manager notified the instructor of a participant facing temporary child care barriers and the instructor allowed the participant to bring one of his children to class. Case managers also work closely with counselors at the service-provider level to identify tutoring opportunities for participants.

While some grantees developed careful strategies in providing responsive case management, we encountered instances in which case management was not an explicit priority in service delivery. This was due in part to high caseloads and the large service area for which case managers are responsible. As a result, case managers only had enough time to check in with clients periodically, through telephone conversations or visits to worksites and classrooms. For example, in one program, a single case manager visits all worksites being used for work experience in one day once a quarter.

We also found evidence that case management activities are practiced informally and often not recorded in participants' individualized service plans. During our review of participant files, we saw little evidence of client contact and follow-up but discussions with case managers reveal that they do in fact provide ongoing support when needed. For example, a case manager indicated that she paid special attention to a participant at risk of dropping out of the program and called him regularly in the morning to remind him to go to his worksite, but no evidence of this was in the case files.

To summarize, the intensity and quality of case management depended to a large extent on the participants' unique circumstances. We found that frequent, intense, and personal contact between case managers and participants appear to be instrumental to a successful case management model. Unfortunately, few staff have sufficient time to spend with participants due to large caseloads, and keeping up with case file notes is even more difficult.

FINANCIAL AND SUPPORTIVE SERVICES

Many participants in Section 401 programs face significant barriers in completing training, including the lack of adequate shelter, food, medical care, training, and childcare. In response to these barriers, grantees provide stipends or a variety of supportive services, or they refer participants to community agencies for these services. Site visits to 23 grantees showed that 22 out of 23 grantees in our sample provide supportive services with JTPA funds. (The one exception relied on tribal or community resources exclusively to pay for stipends and supportive services). Below we discuss how these services are delivered.

Financial Stipends

Thirteen out of 23 case study grantees (56%) provide financial stipends to participants during training. These financial payments are made in the form of incentives, bonuses, wages, or as a needs-based payment. Where hourly payments are made, financial stipends ranged from $1.25 to $4.75 per hour of training; in other cases participants are given a maximum stipend amount during training—ranging from $30 a week to $1,500 per academic year for those enrolled in classroom training. The lower stipends of $1.25 to $2 per hour in classroom training are generally reserved for participants receiving other benefits or supportive services through the JTPA program or through other non-JTPA resources.

Grantees varied in their policies for providing financial stipends. Typically, grantees provide financial stipends for participants enrolled in classroom training activities, including occupational skills training, GED or ABE programs, or classes in community colleges leading towards an Associate or Bachelor of Arts degree. Several grantees paid financial incentives to participants who complete job search preparation classes, most commonly, an introduction to the world-of-work program. Some grantees also provide financial bonuses ($100) to participants for passing GED exams. Programs also used stipends for one-time expenses such as books, school supplies, and tuition.

Among all case study grantees, the amount of payment was contingent upon attendance, and participants were monitored regularly for their participation in classroom training activities. Moreover, some grantees withheld financial payments if participants did not achieve a satisfactory GPA in classroom training activities.

Arrangements to support the provision of financial payments varied among case study grantees. Sixteen case study sites actively leveraged non-Section 401 funding through coordination with tribal agencies, community-based organizations, or other federal resources such as the Pell Grant to supplement financial payments provided by grantees. Some grantees also provide some combination of stipends for training and other supportive services to meet a variety of basic needs during training.

Supportive Services

Supportive services can be very important in enabling participants to successfully complete the INA program, and, as was discussed in Chapter III, a variety of such services are routinely provided. Nationally, assistance for transportation, tools, equipment for training, clothing, and personal or family counseling are the most common forms of supportive services, and financial stipends or help in obtaining financial assistance is also very common.

We learned that case study grantees offer similar supportive services as the grantees responding to the national survey. In the majority of case study grantees, some supportive services are provided either through the grantee, the tribe, or through referrals to other agencies. Transportation assistance is particularly common, and is provided in the form of bus passes, gas coupons, or mileage reimbursements.

We also learned from case study grantees that some provide rental assistance in "extreme" cases. In these cases, grantees pay for some portion of rental costs for a short time until participants receive income provided through JTPA's subsidized employment activities.

Overall, the policies on how supportive services are used differed widely. The majority of case study grantees maintained very flexible policies towards who can receive supportive services and what they are eligible for. Several grantees for example, reported that supportive services are "up for grabs" for all participants enrolled in JTPA because grantees felt that any additional support was essential to the clients' success. Most grantees, however, provide supportive services on a case by case basis or on an "as needed" basis based on an assessment of participants' needs and a review of program resources and resources within the community. Some grantees try to limit supportive services to participants who are already receiving other forms of aid from tribal or other non-JTPA resources. Several grantees even reported that they do not broadcast the availability of supportive services because they wanted to "save money" for direct training activities.

To help fund what was reported to be a "very expensive" service, most case study grantees made an effort to supplement supportive services by identifying and leveraging non-JTPA funds to supplement participants' financial needs. For example, over half of the case study grantees rely on tribal resources or other community agencies to increase supportive services, in the form of tuition assistance, added financial stipends, and child care assistance. In one local site, for example, participants who are enrolled in classroom training can receive financial stipends from the Bureau of Indian Affairs and child care assistance through the Child Care Block Grants arranged through the tribe. Additional supportive services from tribal resources are reserved for tribal members.

The use of supportive services and financial stipends reportedly made a significant difference in helping participants remain in JTPA training activities and transition to self-sufficiency. Given the limited resources available, some grantees carefully targeted the types of supportive services and stipends offered to ensure that those most in need could receive adequate supportive services. A large number of case study grantees, however, have not developed specific strategies on how to make efficient use of limited supportive service dollars and have faced difficulties doing so because of their commitment to serving the needs of their clients.

SUMMARY

This chapter highlighted the variation in the design and implementation of activities and services in support of training among our 23 case study grantees. We noted that some of the differences in how these activities were carried out were partially related to the differences in local contexts, such as whether programs were located in large service areas or were tribal or non-tribal grantees.

In developing targeting strategies, most grantees faced difficulties in establishing specific targeting goals because they felt that all eligible INA applicants were in need of services and the grantee thus did not want to give priority to some individuals over others. In local areas where targeting was an explicit goal, grantees targeted segments of the population deemed "hardest to serve"' by developing clear procedures, such as implementing a "no-repeaters" policy. All case study grantees reported little difficulty in meeting their enrollment goals, and most relied on word-of-mouth referrals. Although this method is generally adequate, it can limit access to services to those who are not as well connected in the community's networks.

Most grantees were careful about tailoring assessment activities to individual circumstances. Accordingly, assessment practices varied widely, because of the differences in the backgrounds and needs of participants and program designs. However, in the majority of case study sites, assessment results often had only a modest impact on the kinds of services that participants received, because a variety of other factors and constraints came into play, including budget limitations, transportation barriers, and the unavailability of a full range of service providers. Moreover, clients often had strong opinions about what services they wanted and needed in the short-run (e.g., immediate income and subsidized or unsubsidized employment), often to the detriment of their longer-term needs. Case management services in general were practiced informally, and were often targeted to participants facing difficulty in training, with less attention paid to those who appeared "to be doing well." The trend towards "targeted" case management thus meant that some participants in need of case management did not receive it because they were unable to communicate this need. Effective case management is greatly hindered by large caseloads and large service areas. Some grantees have devised innovative methods to overcome these challenges by frequently communicating with instructors, worksite supervisors, and other service provider staff to identify clients' needs early and intervene appropriately. And, invariably, case managers were dedicated and caring, and many demonstrated extraordinary efforts to ensure that their clients' needs were met.

VI. BASIC SKILLS & OCCUPATIONAL SKILLS CLASSROOM TRAINING

This section addresses formalized training which is intended to enhance basic academic and work-related skills, provide educational training leading towards a GED or high school diploma, or secure a post secondary degree or certification in a specified vocational or technical area. These services require attending classes and are focused on cognitive development and demonstration of sequential attainment of specific skills and knowledge. They are generally of longer duration than most other JTPA 401 services and require self-directed commitment and motivation for participants to complete a prescribed course of study. The two types of training covered in this section are Basic Skills Classroom Training and Occupational Skills Classroom Training.

BASIC SKILLS

Basic Skills Classroom Training is a service offered by over half of our sample, or thirteen of the twenty-three programs. Even so, it is the service option offered by fewer sampled grantees than any other INA 401 service. Based on participant distributions for PY 96, of the thirteen sites, no grantees made BSCRT a first priority for service provision, only five grantees made it a second or third priority, while eight placed it as a fourth, fifth or sixth priority. This relative infrequency was a factor in our being able to observe only three BSCRT services over the course of our site visits.

BSCRT, being a service which improves basic educational skills primarily in language arts and mathematics or prepares high school dropouts to pass a GED test, is by nature less sophisticated in content than the courses offered in the Occupational Skills Classrooms at community colleges and vo-tech schools. Overall, it was of mixed quality in teaching methodology, in facilities, and in teacher preparation. Of the thirteen grantees offering BSCRT in the examined sample, we observed three during on-site visits. These three were sites where the grantee was the provider, rather than enrolling students at accredited institutions such as state or tribally-operated colleges or vocational-technical schools. This often occurred not by design, but by circumstance.

Adult Basic Education and GED training are often seen as the purview of other tribal departments, either as a program under the Education Department or as a service provided through other resources such as Headstart or JOBS. If an INA 401 program does not offer BSCRT or has a limited service, eligible participants who are assessed as being in need of this type of remediation are often referred at intake to those programs. In some instances, local community colleges or vocational schools, either tribally or state-operated, offer ABE/GED training, and INA 401 participants are referred or encouraged to attend classes at those sites. In those instances, enrollment fees, books and tuition may be paid by tribal assistance programs or by the JTPA 401 programs. These eligible participants are offered other services as appropriate, usually in WEX or CSE to the extent their skill levels are adequate for placements. Some are therefore receiving ABE/GED training elsewhere while also being served by JTPA.

When other resources are not available or adequate however, some INA/JTPA 401 programs do offer basic skills ABE & GED services. In the sampled grantees of this study there was variance in the quality and extent to which participants could receive basic skills training. At one extreme, services were extensive and comprehensive, while, at another, they were minimal. In examining these services, four basic elements were reviewed and addressed. They are:

- Types of providers, including who provided services, where services were provided, formal agreements, and how providers were selected;
- Clients receiving services, including characteristics of those who were participating in ABE/GED programs;
- Intensity and duration of services, including the length of training and the extent to which the time used afforded adequate learning experiences; and
- Quality of training, including learning objectives, curriculum classroom interactions, instructor qualifications and methods of instruction.

Types of Providers

Each grantee has developed a unique way to provide ABE/GED training, and each is unique in determining how, when and where the services are accessed and what participants will be expected to learn. Service providers include state and tribally-operated community colleges, vocational-technical schools and in a few instances, high schools or alternative schools where remedial or GED classes are conducted. In the three sites observed, the INA 401 grantee itself was the service provider. Where that is the case, the classes are held at the grantee's facility, tribal office site or learning center in a specified classroom. Some participants at one site were also referred to learning settings in public school facilities. Those referrals occur because of over-crowding in the classroom or for the purpose of gaining additional skills training such as the "world of work" basic job skills course, which is sub-contracted to an external private-sector provider at one site. Several factors seem to explain why grantees elect to be the service provider 1) it can be less expensive, 2) no other providers are available and 3) some participants seem more comfortable in an "Indian setting" or culturally-responsive setting than in the alternatives provided, particularly in urban settings.

Basic Skills instructors at the sampled sites were either employees of the INA 401 grantee or were instructors from nearby community colleges. Specific qualifications or special required training in adult education for instructors did not always appear to be a priority requirement. However, in all three observed sites, the instructors had achieved some post-secondary education and training.

Clients Receiving Services

The great majority of INA/JTPA 401 clients who are placed in the ABE/GED basic skills programs are high school dropouts. Approximately one-fourth of all the clients served in the three INA 401 sites were reported to have dropped out of school before graduation. The range is 21% to 28% of the total client base. Participants are encouraged to enroll in basic skills if they have neither a diploma nor a GED. In many instances, basic skills reinforcement is a required prerequisite for other services such as Occupational Skills Classroom Training or work-site placements.

The percentage of BSCRT participants in the sample overall is relatively low. PY 96 participation data indicate that only one grantee, a rural tribal program, had more than 20% of participants placed in BSCRT; this highest percentage was reported at 42%. Eight of the thirteen BSCRT providers in our sample, or the greater majority, reported that fewer than 10% of participants were served in BSCRT. One might ask, "why the disparity between reported high dropout rates of 25% in some service areas and the relatively low enrollment percentages?" There is no easy answer. What is not known is the extent to which dropouts come to the INA 401 JTPA programs for basic skills training or the extent that those in need of ABE/GED training are referred to programs or services other than JTPA. What we can say is that JTPA personnel state that clients are referred when the service is not offered by the INA 401 program.

The actual numbers being served in the ABE/GED classes vary. It appears that three factors come into play which govern the numbers enrolled: 1) the funding level of the grantee (larger numbers are enrolled when the funding is larger), and 2) the extent to which there are alternate sources for the training, i.e., tribally-supported adult education programs or federally-funded basic skills services included in programs such as JOBS or Headstart and 3) the percentage of dropouts in the service population. In at least one instance, classroom participants were mixed, with JOBS, Tribal and INA/JTPA participants in the same classroom and using the same computer-assisted learning program.

Most Basic Skills Classroom Training participants are older teenagers or young adults. One grantee program provides a high school completion course at a local public alternative school where participants may complete courses and graduate, or obtain a certificate through a proficiency exam. At another site, the high school graduates are described as lacking in basic academic skills due to the public school's deficiencies, and are enrolled in the INA 401 program to enhance their reading and math skills. At two sites, an open-entry/open-exit policy causes the class sizes to fluctuate as participants come and go at their own pace. Participants are evenly divided between males and females at two of the observed sites and more predominantly female at another site.

Intensity and Duration

The three sites promote flexibility and accessibility through open-entry/open-exit policies. That is, students may enroll at any time during the year and may exit on completion of assignments/course, attainment of a GED, or high school graduation.

All Basic Skills classes are described as self-paced with students progressing through assignments at their individual rates. In one instance, students are provided with workbooks consisting of drill and practice either in ABE basic skills or, more frequently, the standardized material to be mastered in preparation for taking the GED exam. In another instance, students work at individual computers progressing through a packaged Skills Bank III computer-assisted learning program. Under special circumstances, some also receive tutoring at a community college.

At another site, classes are also self-paced but are structured in informal study groups with several volunteer teachers. This is enhanced with life-skills seminars and problem-solving activities to provide experiences beyond basic skills learning.

Under the above circumstances, adult students must themselves be motivated to get the most intense training possible. While instructors serve as facilitators/mentors, they do not formally structure the intensity, difficulty, or duration of the learning sessions.

The structuring of time or duration of the training also varies from grantee to grantee. At one site, the training lasts for 4 hours a day, 5 days a week for a total of 20 hours a week. Because of the flexible entry-exit policy, some participants attend class for several months while others attend a year or more depending on the individual student's progress. On the one hand, this policy provides students with the flexibility they need, given their other obligations; at the same time, without the expectation that a student will successfully complete the training in a given time frame, the student may not maintain the effort to completion.

At another site, the learning center is open 4 hours a day, 4 days a week (with 2 extra hours on Wednesdays for extended learning time). At the third site, there are no set hours, nor set schedule: participants "drop-in when and as long as they want to". Where there is some structure and high expectations are held by the instructors, the success rate is said to be at 80%, or as described by program staff, "most get their GEDs". Conversely, sites with a lack of structure led to limited success.

At one site, the instructor seemed to only be "available as needed" and did not appear to monitor progress. This site was a minimally-funded grantee which paid part of the instructor's salary through the Section 401 grant and a student stipend of $1.25 per hour. This site also had the highest percentage of high school dropouts. More intensive supervision would definitely have been desirable, but budget constraints severely constrained what the grantee was able to do.

Quality of Training

To evaluate the quality of training, we first examined the training content to ascertain if learning objectives were clear and clearly specified to participants. We then reviewed the curriculum and sought to discover how the curriculum was developed. In addition, an analysis of the context in which the content was delivered led to documenting how skills were taught and whether or not they were functionally connected to a "real world" environment. Documentation processes were also reviewed.

Instructional methodology is the second major factor in the "quality of instruction" paradigm. Here we examined instructor/supervisor training and background as well as observing opportunities for active learning, instructor and participant interactions, and the effective use of class time.

Training Content. In all 3 sites observed, ABE training content was uniformly designed to bolster basic academic skills primarily in reading and mathematics. At two sites learning objectives were predetermined by computer software packaging; i.e. the Skills Bank and Skills Bank III adult basic education self-paced/self-testing programs. At the third site instructors determined learning objectives based on individual prescriptions derived from diagnostic pre-testing to determine deficiencies. GED training at all sites followed standardized learning objectives designed to prepare clients to take state-administered GED tests after being pre-tested at the INA/JTPA site. In addition, two sites expanded learning in the areas of creative writing, guest speakers, videos, field trips, JOBNET computer search and word processing. At one site the motivation to obtain a GED was the prospect of employment at a Casino.

There appeared to be little connection to "culture" per se nor any need/attempt to make objectives cultural in nature. In general, expectations were clear as to why participants were there and what they were to learn.

Curriculum Development. With the exception of the enrichment activities previously mentioned, curriculum scope and sequence was pre-designed either in the form of commercial computer-assisted skills programs or state/nationally designed workbook assignments designed to master skills required to pass a GED test. There seemed to be little deviation from the standardized content which GED candidates are expected to learn.

Context in Which Content was Delivered. The ABE and GED skills were the content and the context. Although a variety of methods were used to transfer learning from the page or screen, the assignments themselves dealt primarily with improving those skills which are usually mastered at the high school level. The relationship to the "real world" or the "world of work" was not uniformly imbedded in the courses but more inferred - that is, "you can't get hired without a diploma/certificate". The absence of more explicit real-world connections appears to be a weakness in the sites we observed.

Instructional Methodology. All sites adhered to the principal of "Instructor as facilitator" in theory. Instructors were there primarily to conduct assessments, answer questions, and administer and score tests, as students worked individually. They did not, however, appear to actively facilitate the learning process. While there may have been other class discussions, only one "study group" was observed during our site visits.

Instructional guidance was at a minimum at one site where the instructor was present only one day out of each week. This instructor drives from a local college to the reservation. It is planned that a second instructor from the local school district will also come to the class for two additional days. At the other extreme, at another site instructors were always present during regular hours. The use of volunteer instructors was also used at one site to increase student-teacher interactions.

One is struck by the absence of participatory learning, as most of these observed programs had little or no classroom interaction in the learning process, either instructor-to-student or student-to-student interactions. One might surmise that the classes taught at the high school would be interactive due to the younger ages of the participants. Otherwise, the adult learners were expected to be independent learners. This element of instruction at some of the observed sites can be described as weaker than it could or should be.

OCCUPATIONAL SKILLS CLASSROOM TRAINING

We observed in-depth examples of Occupational Skills Classroom Training (OSCRT) in fifteen out of the twenty-three grantee sites in our sample. At one site, two Occupational Skills Training services were observed, and at another site three examples of OSCRT were observed, for a total of eighteen observations. With twenty-one out of twenty-three grantees in our sample offering this service, it is found in our sample on the same scale as Work Experience and Training Assistance.

The capability to offer OSCRT is enabled and enhanced by the proximity and proliferation of state/tribal community colleges, private colleges/schools and state and tribal vocational/technical schools. With some exceptions, one or more of these institutions are situated within a reasonable driving distance to many participants regardless of the grantee's urban, rural, tribal or corporate status and regardless of their state locations. It is something of a testament to the states' and tribes' community college and vocational technical systems; they serve as invaluable resources for the INA 401 grantees and for those individuals who seek post-secondary training/education but are not prepared to attend a four-year university degree program.

In addition, the course offerings at these institutions are broad in scope, offering a myriad of choices in the pursuit of training leading to a profession or vocation. On the community college level, there is also more flexibility, with courses of study which range in length from 1 to 2 years, resulting in certifications or Associate of Arts Degrees. An added incentive is the transferability of associate degree credit hours to four-year institutions, should a client choose to pursue a bachelor's degree.

Unfortunately one barrier is often the cost. With INA 401 programs usually picking up the costs of tuition, fees, books and a living stipend over a period of 1 or 2 years for each client receiving this service, the number of participants enrolled must be limited. There was a fairly uniform belief among INA 401 grantees that more clients could positively benefit from these services if there were more funds to accommodate them. In-essence, the demand is greater than the available funds when INA 401 grantees must balance OSCRT with other training and job services for which there is also a high demand. One factor which enables INA 401 programs to offer this service is that some tribes have other resources to assist with tuition and transportation, and, in some tribally-operated community colleges and vo-tech schools, tribal members are granted tuition waivers.

Our evaluation of the OSCRT services addresses the same four elements reviewed in the Basic Skills Classroom Training services described earlier in this section. They are:

- Types of Providers
- Clients Receiving Services
- Intensity and Duration of Services
- Quality of Training

In addition, we also reviewed and analyzed the Training Options which were available to participants at each OSCRT provider site.

Types of Providers

OSCRT services are provided on state-operated community college campuses, at state college/university extension sites, at local public vocational-technical schools, at local privately-operated business colleges and at tribally (or BIA) - operated community colleges or training programs. The extent to which an INA 401 grantee contracts with these entities to provide the OSCRT service varies based on the geographic scope of the service area, on the educational/training needs of the clients, and on the course offerings at various provider sites.

An INA 401 OSCRT service may provide multiple options, enrolling clients at any one of multiple providers. One INA 401 grantee simultaneously offered enrollment at a tribally-operated community college, a tribally-operated institute of technology, state community colleges in a metropolitan area, and two university settings in two different states. This was done to accommodate clients who lived in different geographic locations throughout an extremely large service area. Another INA 401 grantee contracted with universities, adult education centers, public and private schools and private post-secondary institutions/business schools. One grantee utilizes five state-operated community colleges located in its service area. Fewer options were provided by a somewhat isolated INA 401 grantee where a state college and a proprietary school were the two provider sites. The fewest options were offered by a tribal grantee which utilized the local tribally-controlled community college, described as "the only show in town".

INA 401 grantees usually have formal agreements with the OSCRT providers which stipulate the costs for which the grantee is responsible. Separate contracts may be drawn up for each client. One INA 401 grantee indicated they had over 300 classroom training contracts.

The selection of providers often was based upon geographic proximity to clients and course offerings, which could meet client needs. Another strong factor, which surfaced frequently, was the longevity of the relationship between the INA-401 grantee and the provider; it was not unusual to hear that they had been "sending clients there for years". In those instances, the quality of the training was also a factor, with the grantees' citing high levels of success with clients completing courses of study, and the high quality of staff provided at the institution.

Reservation-based tribal INA 401 grantees consistently utilized tribally-operated/controlled colleges, technical institutes and training programs as well as other private and public institutions where available. At one tribal grantee site, the tribe provided training and apprenticeships at two tribal vocation-specific training programs (clerical and carpentry) as well as utilizing a state-operated vo-tech school.

Clients Receiving Services

The overwhelming majority of OSCRT clients have a high school diploma or GED certificate, although a few clients lack either. OSCRT participants are assessed through various tests prior to enrollment as well. They usually possess adequate basic academic skills, with one site requiring at least a 10th grade achievement level in reading and mathematics and another stating that "most have a 12th grade reading level". Similarly, at one grantee site, clients must make at least 70% on a math test prior to enrollment in a Blackjack Dealing class. In addition, community colleges conduct pre-enrollment screening utilizing aptitude and interest testing instruments such as the TABE basic skills test, the COPS career survey, the VAL PAR basic skills test, and the ACET self-placement essay test. Clients must demonstrate acceptable levels of proficiency before they are accepted or enrolled. In most instances, if there are academic deficiencies, participants must complete remediation classes before entry into one-year certification or two-year degree programs. These tests are also used as guidance for enrolling participants in one training field rather than another.

Thus, academic requirements for placement into OSCRT are more stringent than for placement in other INA 401 services. Moreover, OSCRT participants are described as highly motivated, in essence the "cream" of the INA 401 client-base academically and are "screened" into the programs. They are therefore considered to be likely candidates for success on the post-secondary level.

The age ranges of OSCRT clients in our sample are reported to be between 18-55 years at one site, 22-33 years at another site, and 19-30 years at another, with some average ages reported as 25 years and 37 years. Interestingly, several grantees indicated that, among their OSCRT clients, were those who were changing careers. Most were unemployed or underemployed. Many were single parents and most were economically disadvantaged.

The numbers of clients served in OSCRT are predictably larger in those INA 401 programs with larger budgets. At the largest program, one-fourth of the clients were served by way of classroom training, utilizing 15% of the program's total budget. At another, 14% of the total program budget covered clients' OSCRT expenses, up to $5,000 per student. The overall range was from 3% to 31% of total INA 401 program dollars. In terms of numbers of clients served annually in OSCRT, the range at sample sites was from 609 at the largest site to approximately 8 at a small program site.

The gender of clients did not play a role in OSCRT placements in the overall sample. At some sites most clients were female, at some the majority were male, and, at some, they were equally divided. Interestingly, eleven women were enrolled at an Aviation Training Academy in a program where the client base was described as "mostly men in their mid-twenties". In building trades occupational training, the clients were predominately male. Overall, there is a tendency for more females to be enrolled in OSCRT than males. This may be related to economic factors (i.e., alternative support for child care) and to the availability of jobs in clerical fields, nursing fields, and day care workers -- positions more frequently filled by females.

The distance to be traveled to attend classes was a factor mentioned by several INA 401 program personnel. As might be expected, clients who had to move to a different city or commute significant distances were at more of a disadvantage than those who could be placed at institutions/schools closer to their residences. This was more of a problem in the more remote reservation-based tribally-operated programs than in the urban settings.

Fortunately, some colleges and universities had established extension classes on the reservations, a promising practice but limited in scope to a few courses of study. Negotiating these kinds of arrangements on a broader basis could alleviate the problem but not eliminate it entirely.

This is probably a good place to address the sense of community, which was voiced by many clients. Their responses centered on two issues, one being their desire to stay in their own communities due to family responsibilities and support systems, etc., and one being their desire to learn an occupation which would provide employment in a local market. The later reflects the sense of "giving back" or "helping my people" as a way of maintaining community/tribal connections.

As to cultural adaptability, all OSCRT clients were proficient English speakers, some being bi-lingual native language and English speakers. The degree to which they were "traditional" or "assimilated to the larger culture" was a variable, as we encountered individuals across an acculturation scale from one end to the other.

One is struck by several positive characteristics of OSCRT clients. While they possess high school diplomas or GED certification, most are described as under-skilled for the job market to which they aspire. However, they are described in terms such as "prepared", "determined", and "highly motivated". In general, they also possess perseverance; one participant stated that she waited two years for an OSCRT opening at her INA 401 program so that she could pursue a nursing career.

Training Options

Across sampled programs the training options available to INA 401 OSCRT participants is broad indeed. In describing them, we will attempt to delineate the courses of study, the degree/certification options, services provided in support of training, and any additional training options which might accompany the Occupational Skills Classroom Training provided at various provider or grantee sites.

Accessible resources (or accessible service providers) is the main factor in determining the options to be offered by an INA 401 program. In addition, funding of the OSCRT service at each program is also a determinant. The more resources and funds available, the more options are possible.

Looking at the categories of providers, one can summarize the options that are available. Providers may be categorized as follows: state-operated vocational-technical schools; state-operated community colleges; tribally-operated community colleges, technical institutes and training programs; private post-secondary technical/business schools; and college or university satellite/extension campuses.

1) State-Operated Vocational-Technical Schools offer courses of study which, upon completion, lead to certifications established by state boards. Depending on the vo-tech school in question, participants may obtain training in any of the following areas: Health Service Technology, Air Conditioning, Allied Health, Auto Collision Repair, Auto Mechanics, Business and Information Processing, Carpentry, Child Care, Drafting, Electronics, Food Service, Horticulture, Physical Therapy, Precision Machining, Printing, Graphic Arts, Truck Driving and Welding. We were able to observe a Health Science class at a state-operated vocational-technical school. The students were all female.

2) State-Operated Community Colleges offer one- or two-year courses which, upon completion, lead to state certification or Associate in Arts degrees, with transferable credit hours accepted towards a bachelors degree at four-year universities. In some cases, there also seem to be shorter courses of study for aides in various occupations.

If the range of options is wide at vo-tech schools, it is often wider and in more depth at most state-operated community colleges. Offered are vocational/technical job skills development courses for certification, which mirror the offerings at vo-tech schools. In addition, one- and two-year courses of study are offered in areas such as: Law Enforcement, Cosmetology, Nursing, Respiratory Therapy, Applied Science, Food Service, Child Care, Computer Technology, Accounting, Natural Resources, Environmental Science, Optical, and Culinary Arts. We were able to observe a nursing class at a state-operated community college. The class consisted of Indian and non-Indian students. At this site it was noted that INA-401 enrollments/training services were based upon the state's economic job market analysis, a practice which increased the participants' ability to obtain employment after completing the training or course of study.

3) Tribally-Operated Community Colleges, Technical Institutes and Specialized Training Programs offer a broad range of courses. Similar to their state-operated counterparts, the tribal community colleges observed offer both certification and associate degree programs in both vocational and technical areas of study, while the tribal technical institutes focus predominantly on the more technically-oriented disciplines (i.e. electronics, drafting, surveying, engineering). At one site the tribe provided certification programs through its own auspices in carpentry and office skills. We were able to observe a Business Computer Applications class and a Blackjack Dealer class, a Carpentry class, and an Office Skills class. In the Blackjack Dealer class the students were Indian and non-Indian, some were INA participants and some were not. We also observed a Computer Literacy class of six females and seven males, a Nursing class which was said to be usually 80% female, a Graphics Arts class where 6 INA-401 students were described as "highly motivated," and a Business Skills class where participants' eligibility was determined by the Social Services Department based on their disadvantaged status.

4) Private Technical/Business Schools offer certification programs in areas such as: Business Skills, Computer Training, Application Development, Microsystems, Administrative Support, Keyboarding, and Data Processing. Some of these private schools provide highly specialized training, such as the National Security Field Experience Initiative Curriculum at the Livermore Lab in California and the Associate of Arts Degree in Applied Science in Aviation Maintenance (and certificates in Airframe and Power Plant Technologies) at the Aviation Training Academy in

Indianapolis. We were able to observe classes at the Aviation Academy and a Keyboarding class taught by a private computer processing company.

5) College/University Satellite/Extension Campuses were training sites operated by state institutions of higher education located on or near reservations or in urban areas. These extension classes and courses of study were similar in content, although the training options were not as varied as those found on the home-based campuses of community colleges. At the site we observed, the tribe provided the space for the study of Office Technology. This was the most unusual situation, because the tribe virtually bought the course of study from the college for $70,000 and brought it to the local community. Such a creative solution is to be encouraged if the expense is not prohibitive.

Services Provided In Support of Training and Other Options

The participants' costs for the OSCRT Training are provided by INA-401 budgets primarily. These costs include tuition ranging from $500 to over $5,000, as well as costs for books, supplies, fees and frequently, living stipends. In addition, at many of the provider sites, supportive services are provided, such as counseling, career guidance and financial assistance resources. A few provide child care. Three INA 401 programs indicated they offered assistance with transportation costs as well. Overall, every effort seems to be made to ensure that clients are given the support they need to succeed.

Described at one site as a "full range of support", supplementary classes are also provided in the form of brown-bag (lunch) discussions, basic skills remediation where needed, extensive placement assessments, "world of work" training, job placement services, tutoring, field trips, and, in one reported instance, incentive awards.

In summary, clients seeking training in Occupational Skills, be they vocational or technical in nature, are more often than not offered sufficient, even abundant, options from which to choose. Not all INA-401 programs are equal in this regard. However, given the constraints of geography and available funds, they are responding in creative ways in order to meet the needs of their clients.

Intensity & Duration of Services

In examining the intensity and duration of Occupational Skills Classroom Training, we analyzed the comparative length of time it took to complete the course of study as well as the amount of time spent in the classroom. In a few instances, those activities offered outside of the "formal" classroom are also taken into consideration.

As to duration, or the length of time required to complete the training, participant students could be found enrolled in short-term courses which lasted four to fifteen weeks, medium-term lasting six to nine months, and long-term courses which lasted one or two years to reach completion. Within this framework, there was variability as well. For example, those participants who were enrolled in Associate of Arts degrees were expected to complete courses over a two-year span, usually having to meet a prescribed number of contact hours per week throughout the 2-year curriculum. Vocational courses such as Nursing required 73 credit hours, spanning four semesters plus one summer session at one site. The Health Sciences Technology degree, a 2-year program, requires 1,026 hours of instruction over 18 courses.

Technical courses of study resulting in certification might be one year in length or require two or three semesters for completion. Course duration in community colleges and vo-tech schools and business schools usually are on a trimester or quarterly system, which allows for flexibility in scheduling year-round and facilitates an open-entry/open-exit policy which accommodates the schedules of adult learners with family or work-related responsibilities. University extension and satellite campuses offer even longer courses of study; at one site the Nursing curriculum took 36 months to complete.

A few INA 401 grantees limit the time that a participant may be served in OSCRT, but most indicate that the client will continue to receive the training support as long as he or she maintains a specific grade point average and acceptable attendance rate leading towards a certificate or degree. This seems to provide extra incentive for clients to successfully complete the courses.

As to the amount of time spent in the classroom or lab activities, where provided, again there is a wide range of requirements. Some classes meet one day a week for a few hours or a full day, some meet up to five days a week from 8:00am to 4:30pm/5:00pm. Within these two extremes are variations in numbers of days and hours of classroom and laboratory hours required. Students are required to attend classes with limitations on the number of absences allowed before penalties or a failing grade results.

Generally speaking, duration and intensity are carefully structured with some flexibility built in, which allows adult learners to maintain their class schedules and courses of study. Should a student have to drop out, they are encouraged to return and resume their study within a reasonable time.

Quality of Training

One way to judge the quality of OSCRT training is to look at the reported completion and placement rates. While we do not have data on all sites, the rates given to us are extremely positive. Five sites report placement or employment rates in a range of 73% to 94%. Additionally, three other sites report completion rates at 95%, attesting to their success. To reiterate, our assessment of the quality of training included the review of classroom materials and observations of classrooms, in order to ascertain information on the following elements of quality:

- Training Content, including clarity of learning objectives and clarity of specification to participants
- Development of curriculum
- Context in which the curriculum was delivered.
- Instructional methodology, including opportunities for active learning, instructor-participant interactions and effective use of time.

Training Content. Training content refers to the skills to be acquired and the knowledge expected to be learned in the classes observed. Some overall course content as it was made available to us is also included, where it sheds light to the scope and sequence of the curricula offered at the provider sites.

Three categories emerge under which we can classify the classroom observations. First is in the area of business (technology, computer applications, etc.), where we observed seven classes. Second is the health occupations area (3 classes observed). Third is the specialized vocational area in which we include classes observed in Carpentry (2), Aviation Maintenance (1), Blackjack Dealer (1), Graphic Arts (2), and Career Preparation (1).

Business curricula and objectives are practical, applicable and focused on specific skill development. While there are underlying theoretical foundations inherent in the content, assignments are designed for practical application in a working setting. This is true whether the INA 401 participant is enrolled in a private, state-operated or tribally-operated post secondary setting. Six of the seven classes observed in the business field were primarily training in computer technology/applications/keyboarding. The seventh, a course in office technology, contained computer applications as well as accounting and career development. Computer literacy in various word processing applications, keyboarding, spreadsheets, desktop publishing, and other elements of computer mastery comprise the skills learned in these classes.

In all cases, the learning objectives are imbedded in the textbooks and exercises in the classroom as well as in homework assignments. Frequently the computer classes also include professional development and career education training which purport to provide instruction in cooperativeness, diligence, leadership, communication skills, problem-solving, job interviewing, poise, dress, goal setting, job searching and resume writing. The intent is to provide a work-ready graduate who possesses office skills and personal skills. The training objectives are established at the provider site and are standardized to conform to the certification or degree programs' requirements. It seems that most of these courses are thus focused on facilitating the transition into the "world of work" Participants follow a specified study plan either dictated by the text/course of study or individually prescribed. In either case, there is clarity in the specified objectives and presumably objectives are clearly understood by participants.

In three of the classes, American Indian cultural elements are also a part of the content and practices in the classrooms. They are said to be "designed for the native learner in mind" and incorporate their cultural values, concepts, and native language where appropriate. In addition, multicultural or cross-cultural issues are explored in seminars at one site. At another, cultural field trips and guest lectures enrich the curriculum.

In the three health-related classes we observed, content was medically based and specific to the day-to-day practical application in hospitals, health clinics and doctors offices. We observed two classes in Practical Nursing and one in Health Science Technology. Nursing students, as required by state certification, were required to master the content in multiple textbooks as well as in class and laboratory work. The Health Science Technology class followed the state-certification curriculum required for nursing aides, home health nursing or practical nursing. The learning objectives were specific, clear and sequential. Participants appeared to understand what they were to learn.

In the observed vocational classes of Carpentry, Aviation Maintenance, Graphic Arts and Blackjack Dealer, highly specialized curricula guided the sequential attainment of learning objectives. Mastery of the learning objectives provided a clear path to successful completion of the courses. They were characterized by formal syllabi and included textbook, audiovisual, and hands-on learning. When required, participants applied learning in labs, machine shops, at blackjack tables, and at drafting tables. In addition, internships were a part of the learning experience. Participants intern at such places as US West and Lawrence Livermore Laboratories. Again, participants were aware of their learning objectives and the curriculum requirements.

Development of Curriculum. Curriculum includes the basic content covered in the INA 401 OSCRT courses as well as any enrichment activities beyond the content. In all the courses of study that lead to state certification, curriculum materials have been developed to ensure that graduates are able to pass the state exams. This involves the use of standardized texts and workbooks, which are sequential and incorporate skills-based and cognitive learning. For the most part, these texts are commercially created and the majority of providers use texts developed elsewhere as a basis for the course work. Class and homework assignments also tend to follow the scope and sequence of the curriculum design

Beyond the core knowledge gained from texts in the various vocational and technical areas, instructors frequently broaden the curricula to include field trips, guest speakers, audio-visuals, career searches and group discussions and lectures about work habits, environments, expectations and local job-market information.

The OSCRT instructors, particularly in accredited institutions, usually have at least a bachelor's degree with additional experience in the professional/vocational areas they teach. They are experienced to the degree that they are able to tailor the curricula to their locales and to the individual needs of their students. At two tribally-operated provider sites, instructors design curriculum contents based upon community and employer surveys

Curriculum contents are delineated in course syllabi, which outline the reading, and workbook assignment as well as individual and group projects required in the various courses. Most instructors describe their curricula in terms of being somewhat flexible or adaptable, and state that they revise them to stay current with technology.

regulations or other requirements. Most also indicate that their course standards are guided by employer needs, seeking to ensure that graduates are work-place ready.

Often courses require hands-on skill development, such as computer technology, nursing, carpentry, aviation maintenance, etc., and include activities in "real world" settings, such as computer labs, construction sites, and airplane facilities. Three of the sites indicate that students are placed as interns at actual worksites such as the Livermore Laboratory where they study the National Security Field Experience Initiative curriculum leading to certification in the handling of nuclear/hazardous waste material.

While the curricula are uniformly pre-set, INA 401 participants undergo comprehensive assessments prior to placement, are provided tutoring if needed (math at two sites and physics at one site), and are guided to adult education classes for other basic skills reinforcement if required.

In addition to textbook/workbook driver curricula, computer-assisted learning is predominant in office-skills/computer technology classes and is frequently designed according to self-paced, self-directed tutorials found in various software packages.

Context In Which Curriculum was Delivered. A contextualized OSCRT curriculum is one in which relationships are drawn to the "real world" or to the applicability of the contents to the actual experiences of the vocational work environment. We also include the extent to which the contents are contextualized in terms of cultural appropriateness to the Native American client. The context is observed either in the content of materials covered, in the activities designed to accompany content, and/or in the personal interactions in the classrooms of OSCRT services.

We will first address the extent to which "real world" applicability is imbedded within the observed curricula of our sampled OSCRT service. Several factors are indicative of contextualization regarding preparation for the workplace environment; they include personal skill building, professionalism, applied skill building, and internships.

Personal skill building may be defined as including instruction, discussions, or activities that enhance the client's ability to function as an employee in a work setting. At least 47% of the OSCRT providers were observed or reported to include training in such areas as decision-making, problem-solving, critical thinking, communication skills and working cooperatively. The last, cooperativeness, was especially prevalent overall. Almost all sites exhibited some type of teaming or group work/projects in which participants were required to work together to achieve an objective or class assignment. Since current prevalent thinking encourages group cohesiveness and cooperative work behaviors, these INA 401 clients are well served. All OSCRT classes should be encouraged to include this training.

Professionalism may be defined as training that enables clients to be more aware of their roles as employees and understand the worksites' employee requirements. We here include training by way of class discussions, lectures and supportive services at the OSCRT provider sites. Elements of professionalism training observed, or reported to us, include punctuality, responsibility, dependability, courtesy and respect. We also include classes or sessions with counselors which address "world of work", resume writing and career/job search training. This was one of the strongest of the contextualized elements of curricula, with 82% of the INA 401 OSCRT providers including part or all of the above elements. It is possible that all of the providers addressed one or more elements.

Applied skill building contextualizes the learning process by allowing the participants to experience hands-on application of the concepts learned. Whether it is using computers in a computer lab, working with the tools and materials in a construction class, or demonstrating mastery of nursing techniques in a classroom or laboratory setting, students are actively engaged in performing "real world" tasks. This was another area where INA 401 OSCRT providers were especially effective. Eighty-two percent (82%) of the classes observed, or reported, hands-on activities in which students performed tasks, under the supervision of the instructor, at least twice a week or daily in some instances. Again, there is the possibility that hands-on activities exist in all OSCRT classes but were not observed or reported.

Internships are those instances where INA 401 OSCRT clients were placed at the worksite after having received some training or where they received all of the training at the worksite. In these instances, training resembled On-the-Job Training experiences but was designed to follow a training curriculum rather than perform a job per se. Clients were classroom trained and supervised by employees at the worksite. This approach was found at only 4 OSCRT sites or 24% of those observed. It is an option to be further explored in those instances where highly specialized training is required or adequate teaching capability coincides with worksite operations.

The final element examined was the extent to which American Indian culture was infused in the curriculum as a form of contextualizing the learning experience. Where training was specific to a tribal enterprise, such as the Blackjack Dealer class, elements of modern culture in the form of tribal operations, mores, expectations etc., were inherent in the day to day training. We were able to identify 6 or (35%) of the OSCRT classes that infused cultural values, beliefs or native language in the curriculum. Two purported to have designed the classes "with native students in mind," and one addressed the cultural attributes of harmony, beauty, balance and unity. These six OSCRT services were provided by tribal/native-controlled technical institutes and training centers. Among the remainder, some cultural references or "understood" elements were present but not specifically designed into the curriculum other than field trips or guest speakers. The extent to which culture plays or should play a contextualized role is the judgement of individual INA 401 programs.

Instructional Methodology. Classroom observations were the primary ways we gathered information to evaluate the effectiveness of instructional methodology in the INA 401 OSCRT services. Here we were seeking to learn the degree to which clients were actively engaged in the learning process and how extensive those learning opportunities were. We also observed the frequency and nature of interactions in the classroom, both instructor-to-student and student-to-student interactions. Finally, we observed and questioned how effectively time was being used inside the classroom and outside the classroom, where applicable.

Our site visit time frames allowed us to observe classrooms for one hour or less at each site. We therefore are providing "snapshots", which appear to be indicative of the INA 401 OSCRT learning dynamic overall.

Were clients actively engaged in the learning process? In 88% of observations (15 out of 17), clients (students) were engaged in active learning all or part of the time. That is, they were working individually or in groups/teams to complete assignments or projects. They were engaged at computers, were actively building or designing, were demonstrating learned concepts or creating their own portfolios. As for the two other sites, we were able only to interview the staff at one site, leaving only one site where active, participatory learning was lacking. Instructors at the 15 positive sites appeared to endorse and value the outcomes when active learning accompanied lectures or text comprehension. This type of learning is also characterized as "hands-on" learning and usually involved the manipulation or use of objects and machinery, including tools, computers, nursing paraphernalia, cards, office equipment, first aid supplies, print shop equipment, and computer software.

Opportunities to learn were extended beyond the classroom as well. Almost all courses included homework assignments at least once a week and some had homework assignments daily. Additionally, individual and small group tutoring was provided, as were extended hours of class time at several sites, to ensure adequate or additional learning time for students who needed it. One class employed the use of "study buddies" for reinforcement of learning.

Related to active learning are classroom interactions. What role does the teacher or instructor play? How do students interact with the teacher and with one another? How extensive are the interactions? These were questions we sought to answer through our observations. In at least 76% of our observed OSCRT classrooms, interactivity was a dominant method of instruction. Teachers described themselves as facilitators/mentors and described their classes as participatory. Most stated that they lectured only a portion of the time or "little at all", preferring to let students interact rather than passively listening. Lectures were accompanied by demonstrations or modeling of concepts by the teacher, followed by students questioning and then demonstrating their mastery individually or in groups. Discussion groups were prevalent, as were team and group activities.

In addition, teacher roles included daily monitoring, administering oral, written and skills tests and providing feedback to the students. The quality of interactions can be described in terms such as "lively" "easy-going" "supportive" and "cooperative". Learning environments for adult learners are said to be more successful where the students take ownership of their learning and are in an environment that is psychologically comfortable, lacking in intimidation. With the exception of one site, INA 401 OSCRT providers do appear to employ facilitative instructors who adhere to those criteria. Many were described as "caring" about their students. This was true regardless of the type of provider, the locale, or whether the instructor was Indian or non-Indian.

The structuring of class or learning time was the final element of our analysis. How was class time used and was it effective? By all indications previously described, we can conclude that learning time in OSCRT classes is effective overall, that students are not wasting their time or the instructor's time. In most courses, learning time is divided between classroom instructional time and laboratory or clinical setting activities. These are frequently scheduled on alternate days, similar to university time structures, or scheduled for one to occur in the morning (lecture) and one in the afternoon of the same day (lab) or vice versa.

The terms self-directed or self-paced are frequently used to describe how time is structured as students progress through assignments and projects. This is another way that students are given the responsibility for their own learning and for working cooperatively on group projects. It is probably harder to let one's own work slide when there is inter-dependency for accomplishments and reward.

Class time and "extra-curricular" time is enriched through the use of videos, films, field trips and guest speakers at many sites. At least 65% (11 of 17) of the INA 401 OSCRT service providers build in time for clients to participate in these activities, which add depth and dimension to their learning experiences.

In summary, the two types of educational classroom services, Basic Skills and Occupational Skills stand in contrast to one another. The first is the provision of fundamental training which is a prerequisite for functioning in the vast majority of occupations, namely reading, writing and calculating and obtaining the equivalent of a high school diploma. The other, the training needed for specific occupational employment, is professional in nature and usually accompanied by certification and college credit. Is one more important than the other? Maybe not. Is one more emphasized throughout the sample? Yes. Occupational Skills. Occupational Skills Training outcomes are more obviously positive—most participants completing courses of study in chosen fields—most of which coincide with needs in the labor market. They are therefore, more likely to obtain long term unsubsidized employment.

VII. ON-THE JOB TRAINING

This chapter focuses on the On-the-Job-Training (OJT) component of the JTPA Indian and Native American program. The objective of this training activity is to provide JTPA participants with work-based opportunities for occupational skills training *after* employers have hired them. This "hire-first" strategy is intended to induce employers to provide quality skills training for participants who are in-need of such training in order to maintain their employment status. Employers may be reimbursed for up to 50% of participants' wages for up to six months based on the terms of individual contracts negotiated by employers, participants, and JTPA staff. Reimbursements are intended to compensate employers for productivity lost as a result of participants' training—without which participants would be ineligible for employment. Although OJT is primarily a training activity designed to promote the acquisition of occupational skills, there is an expectation of long-term, full-time, unsubsidized employment after the contract expires.

The chapter will discuss findings generated by site visits to 23 grantees and in-depth observations of OJT programs at 6 of these sites. First we provide an overview of the OJT service activity, including a discussion of statutory requirements and objectives. We then describe the objectives of the grantees that provide OJT programs as a part of the services packages they offer their participants. We also describe the design and delivery of OJT programs, including challenges and successful practices. Finally, we use the model of high-quality training (presented in Chapter I) to assess the effectiveness of the OJT component of the JTPA INA program.

OVERVIEW OF OJT

On-the-Job-Training is an activity designed to link employers hiring in specific occupational areas and individuals who command basic skills and appropriate core knowledge about these occupations, but require training in specific skills or competencies. OJT is also an allowable service activity outside of the Title IV program. However, two factors distinguish *INA* OJT programs from other types of work-based job training programs. First, the dearth of employers located in or near most Title IV services areas, especially on reservations, prevents many grantees from developing OJTs with private sector employers. Thus, these grantees often use OJT to

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provide training opportunities for newly hired tribal agency staff or for individuals seeking training, and subsequent employment, with tribally-owned enterprises.

In addition, because the JTPA INA program seeks to enhance the economic well-being of not only participants, but the communities from which they come, INA grantees serving areas that do offer many employment opportunities often target Indian-owned businesses as potential work or training sites for participants. These grantees perceive the OJT program as a means of helping Indian firms defray some of the costs associated with training and hiring new employees and providing needed support for growing Indian businesses. Presumably, as these businesses prosper, they will enhance the vitality of the Indian communities in which they are located, both by providing employment opportunities and offering goods and services to local residents. Grantees perceive this support for Indian-owned firms as well within the mandate of the JTPA Indian program.

On-the-Job Training activities under Title IV are designed to provide participants with meaningful training that will enable them to learn the skills required to perform effectively in their new jobs. For employers, the program provides opportunities to hire long-term employees who receive customized occupational training provided during work hours in exchange for a subsidy to compensate for the presumed loss of productivity during such training. Participating employers are expected to work with JTPA staff to develop contracts, in which key features of the training plan are identified, such as length, duration, and objectives of training. Participants, employers, and JTPA staff are also expected to describe when and how participants seek to accomplish their training goals. The training plans are intended to help employers identify the areas in which participants require new skills, plan to deliver appropriate training in these areas, and ensure that participants' training programs will enable them to achieve measurable skills gains by working toward specific training objectives.

Public and private-sector employers may participate in OJT programs. The contracts are binding for the duration of the training program—usually to a maximum of 6 months. Participants typically engage in program activities on a full-time basis, but the proportion of time spent training and the corresponding proportion of time spent working vary significantly with each OJT contract. Unlike other work-based activities under the Title IV program, OJT programs generally target participants who have a solid work history or who have already completed another training component. Typical participants are work-ready high-school graduates, and may be skilled or semi-skilled in a particular vocational area. These participants are generally compensated at an hourly rate that exceeds minimum wage. For this reason, OJTs are perceived as "expensive" program activities by grantee staff. Finally, because participants are actually hired by their employers prior to developing the OJT contract, there is a clear expectation of continued employment after the contract has expired. However, ensuring that OJT programs do, in fact, lead to long-term, unsubsidized employment for participants has been a challenge for Indian grantees.

Fourteen of the 23 sites we visited as part of the evaluation offered OJT as a service activity. At these sites, we conducted interviews with administrative staff at all levels to learn about program design, delivery of services, and outcomes. At six of these sites, we were able to observe service activities and conduct interviews with OJT participants, their employers and case managers, and the administrative staff of the INA programs responsible for OJT services. We also reviewed the case files of many of these participants. During our site visits to the ten grantees that did *not* offer OJT as a service activity, we held discussions with program administrators and front-line staff about why they had not developed OJT programs or why they had eliminated the activity from the menu of services they provide.

In this chapter, we discuss the design and delivery of OJT service activities based on our site visits to the 23 grantees in our sample. First we discuss how and why grantees emphasized (or did not emphasize) OJT as a service option, and identify common features of OJT programs across sites. We then address the diverse objectives of OJT across grantees, examining the ways in which local program designs address the needs of Indian participants and communities. Finally, using the quality principles identified in the model of high quality training introduced in Chapter I, we provide an overall assessment of the OJT program component.

OJT FREQUENCY AND DEGREE OF EMPHASIS ACROSS SITES

Fourteen of our 23 case-study sites, or 62%, offered OJT as a service activity during the programs year in which we visited them.[1] Two additional sites reported that they had offered OJTs in past years, but had ceased using them in response to federal budget cuts over the past three years. One of the 14 grantees, a tribal grantee, indicated that OJT had not been an area of focus for several years, but as a result of efforts to conduct job development with target industries, OJT contracts were again becoming an attractive service option.

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[1] However, sites offering OJT services were somewhat over-represented in our sample. Based on PY 95 ASR data, only 40% of all grantees reported offering OJT services to their participants.

Among the grantees in our sample, tribal entities were more likely to offer OJT services to their participants than non-tribal grantees. Of our 23 sample sites, 14 (or 60%) represented tribal entities, and 9 (or 40%) represented Indian-serving organizations with no specific tribal affiliation.[2] Among the tribal grantees, 10 (or 71%) offered OJT services to their participants; while among the *non*-tribal grantees, only 4 (or 44%) did so.

This finding was somewhat surprising because *non*-tribal Indian-serving organizations tend to provide services in areas that are more urban, and therefore offer more opportunities for partnering with private-sector employers. We anticipated that OJT programs would represent a larger share of these grantees' total services than they would among tribal grantees, which offer fewer private sector employment opportunities because of the remoteness of their reservations. This was not the case. The examination of the service designs of grantees serving diverse populations in different contexts, provided later in this chapter, will shed additional light on this issue.

Reasons for Not Using OJT

Among the nine sites that do not currently enroll participants in OJT programs, the following were cited as the key factors that prevented their use:

- *Inadequate funding.* Almost all of these nine grantees indicated that their current funding levels prohibited the development of OJT programs. Two of them reported that they had offered OJT service activities in prior program years, but could no longer afford to do so.[3]

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[2] Although many of these grantees served participants from a single or only a few Tribes, depending upon the diversity in their local service areas.

[3] However, among these grantees, all but one offer either WEX or CSE, and more than half of them offer *both*, even though these service activities have the potential to cost as much or more per participants as OJT programs.

- *Absence of private sector employers willing to hire OJT participants.* Although the lack of private sector employers represents a challenge for most grantees, three grantees[4] specifically cited this issue as a barrier that prevented them from offering OJT service activities in particular.[5]
- *Potential for employer abuse.* Most sites reported that they had experienced or were aware of instances of employers taking advantage of OJT programs and participants.[6] Three sites reported that they did not offer OJT specifically to avoid such abuse. In one site, this policy was informal—OJT existed as a potential service activity, but program staff had not enrolled a participant in an OJT program for several years.
- *Low demand for OJT service activities among participants.* Several grantees reported that they had made strategic decisions to omit OJT service activites from their program designs because other service activities were more appropriate for their particular customers. One grantee specifically pointed to the lack of interest in OJT services among participants in the local service area. This grantee reported that the vast majority of participants required both basic and occupational skills training—the grantee, therefore, emphasized these services rather than work-activities or work-based training.

Overall Benefits and Challenges in Using OJT

Data from the PY 96 ASRs show that OJT represented a fairly small percentage of the total cost of services provided to participants among most of the 23 grantees in our sample. As already noted, nine grantees expended no funds for OJT at all. Among the 14 remaining, at one extreme two grantees allocated 24% of their total funds to its OJT programs, and another allocated 17%.[7] In contrast, many others allocated only a percentage point or two of their total funds to support OJT activities. On average, however, sampled grantees who used this service activity spent approximately 6.2% of their funds for this purpose. Similarly, participants who were enrolled in OJT services represented a fairly small percentage of total participants among most of the grantees in our sample—generally no more than a percentage or two, but in the rare case reaching about 20% of the total.

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[4] All three grantees were tribal grantees located in rural areas.

[5] Although the absence of employers was cited as the *key* factor, one of these grantees reported that, among the few employers that were accessible to participants, racism prevented those employers from hiring INA participants. The grantee noted that even the subsidy offered as a part of the OJT program was not a sufficient incentive to generate interest in the INA program among most local employers.

[6] Employer abuse may take the form of paying wages lower than market value, failing to provide meaningful training, etc. Employer abuse of OJT service activities has not been limited to the INA program, and has been documented among agencies and organizations offering OJT services elsewhere in JTPA. Technical assistance in developing high-quality relationships with employers, thereby diminishing the potential for employer abuse, may be of benefit to grantees concerned about this issue.

[7] One of these grantees had not offered OJTs at all for the previous several years. However, changes in the local economy spawned interest in job development that targeted particular industries. The grantee invested heavily in OJT programs as a primary vehicle to support this economic development strategy.

Among the 14 sampled grantees who offered OJT as a service option to INA participants, staff identified important benefits of this service in comparison to others offered by the program, including the:

- *Potential for long-term employment.* Because OJT services are guided by formal written agreements (contracts) between participants, program staff, and employers, the potential for long-term employment is often greater for participants in OJT programs than for participants in other work-based activities.
- *Potential for "career pathing."* Participants who integrate training and employment may be more likely to continue to train on-the-job, even if the INA program does not subsidize the training. This additional training enables participants to seek promotions and higher-wage job opportunities as they master new skills, ultimately improving their standard of living. In addition some grantees target entry-level jobs or industries with high turnover and opportunities for advancement so that participants in these positions can gain access to new jobs as they master the skills required in their entry positions.
- *Potential for varied employment opportunities.* Employers participating in the OJT program can be associated with the public *or* private sectors. As a result, the range of training and employment opportunities available to participants has the potential to be quite broad.
- *Potential for mentoring relationships.* Because a formal training plan is required as a part of all OJT programs, employers generally ensure that a manager or long-term employee monitors the OJT participant during training. These individuals can "model" appropriate work-site behavior and assist OJT participants in learning company "culture," in addition to specific training content. Such comprehensive learning better prepares participants for jobs and for eventual career advancement.
- *Potential for community benefit.* Many grantees target Indian-owned businesses or private-sector firms that are seeking to build the infrastructure or meet the basic needs of Indian communities. This benefits Indian communities in at least two ways: (1) by subsidizing a portion of the costs associated with training and hiring while ensuring

that these firms have access to trained and appropriately skilled employees that will enable the firms to grow, and (2) by linking individuals to jobs, thereby supporting self-sufficiency and career advancement among community members.

These benefits motivate grantees to continue to offer OJT services to their participants.

There were also, however, clear challenges to grantees attempting to make OJT service options available to program participants. Some of these challenges are identical to those identified by the grantees that do *not* offer OJT services. As described above, these include funding challenges, low-levels of private-sector participation, low demand for OJT services among program participants, and the potential for abuse of OJT programs by employers. There were also some additional challenges that grantees providing OJT services identified, including:

- *Matching the skills of participants to the human resource needs of employers.* Grantees in areas with little private sector development in their service areas or in areas dependent upon single industries indicated that the small number of employers or their lack of diversity made it difficult to effectively achieve this match. Grantees in more urban areas reported that, although nearby employers were actively hiring, their participants did not possess skills in demand.
- *Developing high-quality relationships with employers participating in OJT programs.* Most grantees acknowledged the importance of developing relationships with employers to ensure that current OJT participants receive quality training and to maintain employers' interests in OJT programs. In some cases, grantees had simply not been successful in developing such relationships.
- *Developing/securing approval for OJT contracts.* Tribal grantees, in particular, reported that the frequently lengthy tribal approval process for OJT contracts made it difficult to maintain employer interest in the program.
- *Ensuring that meaningful training occurs as a part of OJT programs.* Grantees, both tribal and non-tribal, also reported that they were in need of training or technical assistance in developing operational work-based training plans and working with employers to ensure that such training actually occurs.
- *Assisting participants in transitioning to a full-time work-environment.* Some grantees indicated that OJT participants could not successfuly make this transition, and dropped out of the program before their training program was complete or even just after they finished. These

grantees seek to develop ways to help their participants successfully navigate the transition to long-term employment.

- *Sustaining funding and internal support for the program.* Several grantees indicated that their OJT programs were under threat as a result of budget cuts or overall financial strain. This pressure has reduced the number of OJT "slots" available in several sites, and impacted the quality of services provided in others.

Despite the innovative strategies that some grantees have developed, which are discussed later in this chapter, these challenges prevent many grantees from making effective use of OJT, and prevent other grantees from offering OJT services at all.

GRANTEES' OBJECTIVES FOR OJT PROGRAMS

Most grantees approached OJT programs with a healthy dose of skepticism. Respondents were well versed in the more controversial aspects of this service activity, including the lack of safeguards to ensure employers actually do hire participants in accordance with their contracts, and repeatedly cited these issues, among others, as barriers to the development of high-quality OJT programs. While such skepticism is not wholly undeserved, it has clearly prevented many grantees from fully integrating OJT programs into the menu of services they provide to participants. More importantly, because most grantees use the OJT program infrequently, many have not developed an overall strategy for the program in relation to other service activities, including identifying specific program objectives and target groups of employers and participants, and developing processes for follow-up during and after OJT programs are completed.

In addition, because the program is not tremendously popular among JTPA program managers and supervisors who are most keenly aware of past instances of employer abuse, there is little incentive among front-line staff to fully develop these programs or attempt innovative approaches to OJT service activities. More often than not, grantees cited OJT programs as "too expensive," even though many of these same grantees promote CSE and WEX as service activities, which can be as or more costly. Alternatively, grantees reported that OJTs were considered "more trouble than they're worth," despite their greater potential for long-term employment as an outcome in comparison to other work-based training activities.

Among the grantees that did offer OJT service activities to their participants, the following outcomes were most frequently cited as the primary objectives of the OJT program component:

- *Long-term placement for participants.* Although there is an expectation of placement subsequent to the training component in all OJT programs, most grantees seek to ensure that the placements are long-term and of sufficient quality to provide for family self-sufficiency.
- *Employability for participants.* In addition to employ*ment*, most grantees seek to ensure that OJT participants *become employable*—that participants are sufficiently trained in an industry or in specific skill-sets to be able to attain employment after they master the initial job tasks, in the absence of an eventual offer of long-term employment by the participating OJT employer.
- *Supporting targeted economic development.* As Indian communities seek to develop their infrastructures, many are targeting the development of specific industries. OJT can be an effective means of training a local workforce to support those industries—several grantees use OJT to support this.
- *Recruiting private sector employers.* Because the OJT program offers services to employers—assistance in recruiting employees and a partial reimbursement for the costs of training—as well as participants, it can provide incentives for employers to participate in subsequent OJT programs or in other components of JTPA INA programs.

Although these were the general objectives of the OJT component of the JTPA INA program, as cited by grantees, specific objectives varied, depending upon participants recruited and the types of OJT programs offered.

DESIGNING AND DELIVERING OJT SERVICES

The OJT program is unique in that it serves two customers—the participants and the employers. While other JTPA service activities offer short-term training and work experience, such as WEX and CSE activities, the OJT program is guided by a formal contractual relationship in which employers become explicit customers of the JTPA program. As a result, designing OJT programs requires JTPA staff to skillfully negotiate a balance between the interests of individual participants and those of the employers, so that both sets of customers realize high-quality outcomes.

Three key interrelated factors influenced the design and delivery of OJT services among the grantees in our sample. These included: (1) the overall approach to JTPA services generally, and to the OJT program in particular, adopted by the grantees, (2) the local context in which JTPA programs operated, and (3) the adequacy of support—financial and otherwise—available to support JTPA participants generally, and OJT participants in particular. To varying degrees, each of these factors shaped the way OJT programs were designed and caused grantees in our sample to develop programs that exhibited considerable diversity within and across local sites.

There were two dominant patterns with regard to designing OJT service activities among the grantees in our sample: (1) those arranging OJT slots with diverse employers, typically for work-ready participants, and (2) those arranging multiple OJTs to support targeted economic development among specific firms or industries.

Grantees tended to use both approaches, either alternately (depending upon the local economy, environment, or context) or with different segments of the communities they served. However, most grantees' overall program designs and services were *dominated* by one of these patterns. What follows is a discussion of grantees' experiences in implementing each approach, including a description of the benefits and challenges they encountered as they sought to provide quality services to their communities.

Approach #1: Providing OJTs with Diverse Employers

Most grantees serving diverse participants had established "service tiers"—or menus of service options appropriate for participants requiring different levels of assistance from the program. Among the grantees that use this "tiered" approach to service delivery, OJT generally represented a service activity for participants who required little direct intervention or assistance either because they had progressed in the JTPA program, or because of the skills and experience they possessed when they enrolled in the program. These grantees generally targeted particular groups or individuals for participation in their OJT programs, then identified employers who could benefit from the skills and experiences of these individuals, and developed OJT programs that would meet the needs of both sets of customers.

The majority of grantees using this "tiered" approach to service delivery based their referrals to the OJT program on one or more of three sets of characteristics:

- *Significant work experience.* Although there was not a specific work experience requirement for participation in OJT programs, most grantees sought evidence of participants' basic workplace skills, such as reliability, appropriate workplace behavior and appearance (attire), and ability to follow directions or work with others. Participants who had held a job over time (more than six months with the same employer) were generally assumed to be competent in these areas.

- *Transferable Skills.* Participants referred to OJT programs were not assumed to be seeking work in the same field or industry in which they possessed experience. However, participants who possessed skills that were easily transferable to other career areas were more likely to be referred to OJT programs than other participants were. For example, home caregivers—individuals caring for elders or children without pay—who were interested in careers as caregivers were frequently referred to OJT programs.
- *Specific (and informed) career interests and objectives.* Some participants seek specific jobs or career opportunities through the JTPA program. These participants may have informal experience or skills, or they may just have strong interests. If their interests and expectations are informed, they too are likely to be referred to OJT programs. For example, a participant may have assisted in a particular vocation associated with a family business or profession, and seek to enter that career area. He or she would benefit from some formal training and work experience on the job.

In addition to these three criteria, a high-school diploma or GED equivalency was also preferred for OJT participation among most grantees serving diverse participants. These factors were taken as evidence that a participant was job-ready, and such participants were more likely to be slated to receive OJT than others.

Using Assessment in Designing OJT Services. In designing OJT programs for participants initially determined to be job-ready, most grantees emphasized skills, experiences, and training needs over general career interests in assessing participants' ability to participate in a particular OJT occupation. Job-ready participants were not necessarily required to complete the full battery of assessments recommended to participants requiring more comprehensive assistance. Although this approach is clearly a more efficient use of staff and participant time and resources, it is crucial that the initial assessment is *accurate*—and this was not always the case. For example, the grantees' informal assessment of participant experience sometimes caused participants to be placed in jobs that they may have been *qualified to do*, but were *not interested in doing*. This can lead to dissatisfaction for both employers and participants in the short-term, and compromise the grantees' program quality over time.

Most grantees did require that participants initially deemed to be job-ready take the basic reading and math skills assessments, because these skills were required for most OJT positions. Many grantees set a kind of informal threshold that participants were required to achieve prior to enrolling in an OJT program. If skill-deficits were revealed during these assessments, staff generally made alternative referrals—to basic skills classroom training or other skill-building programs. This threshold served as a check to ensure that individuals with experience or interest also possessed the skills required for them to succeed on the job. Alternatively, it can also help case managers to work with employers to design programs that were appropriately challenging to participants. For example, one participant with a diploma and two years of college math was still required to take the basic math skills assessment prior to her accounting OJT program—not surprisingly, she received a nearly perfect score. This gave her case manager and future employer great confidence in her abilities, and prompted the two to work together on a more intensive training plan than had originally been proposed.

Developing Appropriate Service Mix. Grantees designing diverse OJT positions for work-ready participants tended to offer OJT as a stand-alone activity, or sometimes pair it with classroom training. These grantees perceived OJT programs as activities appropriate for participants who "just need a little help"—they might be skilled but unable to locate appropriate employment, experienced but without a recent work history, or motivated and interested but lacking experience. The OJT program can offer structure, training, and paid work-experience, satisfying many of the needs of these participant groups. Alternatively, OJT served as a school-to-work activity for participants who completed vocational or occupational training or their high school equivalency, and sought to transition into full-time employment.

Developing Appropriate Service Length/Intensity. Grantees that arranged OJT positions with diverse employers for job-ready participants also tended to emphasize the development of OJT programs that were customized to meet the needs of individual participants. As discussed above, one way this occurred was through the combining and sequencing of multiple service activities and supports.

Another strategy was varying the length or total hours of OJT programs to best meet the needs of the participant, employer, and grantee, within overall limits set by the grantees and federal regulations. For example, although the legislation limits OJTs to 6 months, a few grantees placed their own (formal or informal) caps on the number of days/hours participants may engage in OJT programs. One grantee, for example, limited OJT contracts to 13 weeks—half of the allowable program length under federal JTPA regulations. Alternatively, one grantee placed a monetary cap of $1,300 on OJT contracts, regardless of the number of hours worked. These strategies permit grantees to offer OJT as a service option to more JTPA participants. However, they also reduce the capacity of the program to market the service to employers because the incentives for employer participation, their wage reimbursements, are not as significant.

Within these limits, most grantees worked with individual employers to identify a period of time after which participants were expected to perform at the level of other employees, rather than as trainees. For example, if the expected training time for an experienced new employee working for a particular employer was two weeks, then a JTPA participant who might have formal training but no experience might be working on an OJT contract for 2-3 times longer.

Grantees have also worked with employers and participants to develop OJT contracts around particular competencies. For example, a grantee might agree to support an OJT contract for no less that 8 but no more than 12 weeks, by which time the participant must be able to demonstrate some minimum level of competence in required skill areas. Grantees have also worked with employers and participants to develop programs that demand two-, four-, or six-hour workdays rather than the standard eight-hour days, so that the participant may engage in other service activities (e.g. classroom training) or meet child-care or other obligations. For example, one grantee designed a four-month OJT in which a participant worked in the accounting/billing department of an Indian-owned firm, and enrolled in related coursework for two-hours per week during that time. At the conclusion of the OJT, the participant planned to continue working with the firm, taking on increasing responsibility, and enroll in additional coursework leading to a degree in accounting.

The ability to adapt OJT programs to meet the specific needs of employers and participants is critical for grantees providing services to participants with diverse skills and experiences.

Developing Training Plans. Grantees are required to develop a training plan for all JTPA OJT contracts. At a minimum, the plan should include: (1) an outline of the length and nature of the training and the specific skills to be taught, (2) a description of the job for which the participant is being trained, (3) a plan for ensuring that participants progress throughout their OJT program, and (4) a reimbursement schedule or identification of the maximum subsidy the employer can receive as a part of the contract. Nonetheless, because grantees that emphasized OJTs with diverse employers designed primarily *individualized* OJTs, there was great variation in the content, duration, and quality of the training plans.

Most grantees we visited did ensure that there was a written document outlining planned training content and objectives for each participant. However, the level of detail describing how the training would actually take place, and identifying the supervisors' strategies to ensure that skills were learned, varied widely. Where training plans were well developed, they could be used to help participants and employers benchmark participant progress and ensure that the expectations of employers, participants, and case managers were being met. They also served as a "check" on program coherence by ensuring that new skills participants were required to learn related directly to the positions for which they were being trained. Perhaps most importantly, training plans helped participants seeking long-term careers begin planning for them. When participants and their case managers used their training plans to monitor progress, participants were better able to articulate the skills they were learning as a part of their OJT programs and understand how those skills might be applied in other employment settings or in other future activities.

For example, we interviewed one participant who was enrolled in an OJT program within a tribal enterprise (small-business). She and her case manager, together with her current supervisor, developed a training plan prior to her work with the tribal enterprise. She was very familiar with her training plan and was able to identify specific skills she had acquired during her OJT, as well as "professional development opportunities"[8] she had requested and completed. Another enterprising young participant with whom we spoke also worked closely with her case manager and supervisor to develop her OJT training plan. She was placed in an office environment and learned about numerous professional development opportunities in which she was interested in participating. When she requested support for these opportunities, her supervisor asked her to develop a proposal explaining how these opportunities were consistent with her original training plan. She drafted a letter and was able to take advantage of two such opportunities.

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[8] The participant used this phrase to describe two out-of-town seminars she had attended which, although they were not part of her original training plan, she had suggested to her supervisor might be beneficial—he agreed and she attended the seminars.

Another grantee described an instance in which a former participant was able to demonstrate skills achievement with his training plan, which was signed by the participant, the case manager, and the employer at the conclusion of his OJT program, and earn credit toward his Associates Degree.

The majority of the participants with whom we spoke who actively participated in the development and ongoing revision of their training plans expressed greater clarity with regard to not only their training programs, but their comprehensive personal and career goals than did participants in OJT programs who were not as familiar with their training plans.

Finally, when training plans were used to guide OJT program implementation, a clearer break existed between the training program and the subsequent job—whether the job was with the OJT employer as intended, or with another employer. This break can enable participants to work with their supervisors and case managers to renegotiate their job descriptions *and their wages*. Since OJT programs are training activities, the wages tend to be run below current market value—the break between training and permanent employment can provide an opportunity for participants to renegotiate their hourly rate or salary.

One participant, for example, was able to document her progress in achieving her OJT program goals and use this in clarifying her new roles and responsibilities. Because she could demonstrate that she met her training objectives ahead of schedule, she successfully transitioned into a position with considerably more prestige, responsibility, and remuneration.

These anecdotal cases illustrate some of the potential benefits of developing effective and useful training plans. Although shorter OJT training programs may not merit lengthy, sophisticated plans, a simple process of identifying the skills to be learned and developing a process to ensure that learning takes place can have clear benefits for participants, employers, and program staff.

In contrast, during our random case file reviews and in examining the case files of the participants with whom we met, we found instances of insufficient—or non-existent— training plans. In other cases, training plans were developed without the knowledge and input of the participant. For example, in some cases, an employer's job description served as the training plan. If these job descriptions identified specific skills to be developed and included some mention of specific means of developing them, they may have indeed served as adequate plans. However, some of the job descriptions included only the job title, the employer's name, and one or two sentences describing the position. Such descriptions were not effective training plans.

Alternatively, in some cases training plans were developed, but were not specific enough to be used in monitoring participant progress. For example, one training plan identified "learning office procedures" as one of three training objectives.[9] Although this is a reasonable overall objective for an OJT program, it is "open-ended" and does not enable participants to assess their own progress or skills gains—presumably the participant will *always* be learning office procedures as new practices are adopted or procedures developed. Moreover, we also learned about conflicts that arose when the participant thought they had mastered a general skill area, but the supervisor disagreed. Training plans that identify specific skills, rather than more general categories in which learning takes place, may serve to prevent such misunderstandings.

Finally, in some cases training plans were developed either by the case manager alone, or the case manager and the OJT supervisor collectively, without the input of the OJT participant. Although the case managers and supervisors, as professionals, are amply qualified to write quality training plans, when participants are not involved in the process their understanding of the OJT program and activities is undermined and their ability to take an active role in their own training is compromised. In interviewing participants, we learned of instances in which training plans were developed that were inconsistent with participants' expectations. This created tension between participants and their supervisors, and compromised the relationship between employers and JTPA program staff.

Developing useful training plans for individual OJT participants represents a challenge for grantees. We found great variation in the types and quality of training plans not only among grantees but also among different agencies associated with the *same* grantee, and even among different OJT programs developed by the same agency.

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[9] The other objectives included "learning about the business" and "learning to work with others."

but by different agency staff. Developing individualized training plans for OJT participants is a challenging but crucial part of providing high-quality OJT experiences for participants that lead to long-term employment and positive individual and community outcomes.

Support, Supervision, and Oversight of OJT Activities. Like the variation in type and quality of training plans, we also observed significant variation in the frequency and quality of ongoing monitoring activities among grantees whose program designs emphasized services to participants with diverse skills and experiences. Most of these grantees indicated that they encouraged case managers to maintain at least monthly contact with JTPA participants to assess participant progress, provide necessary support, and ensure that the plans driving their work or training programs remain useful and accurate. Our interviews with case managers and participants and our review of participant files indicated that such contact was less likely to be maintained when participants worked or trained "off-site"[10]—and OJT participants in particular were more likely to be placed "off-site" than participants in other service activities. As a result, the frequency and intensity of contact between participants and case managers or case managers and supervisors was largely a function of case managers' interest, diligence, and time availability.

At one extreme case managers had almost daily contact with OJT participants. This was common where participants were placed in the Employment and Training Department or other agencies or nearby offices, or when the case managers and participants lived near one another. At the opposite extreme, we spoke with case managers who do not typically initiate contact with the OJT participants once they are placed, although they will respond if a problem arises. The few case managers who adopted this approach reported that once participants were placed, they did not want to interfere by checking up on them because they feared that employers would perceive such efforts as intrusive.[11] More common however, was weekly to monthly contact between participants and case managers, although contact between case managers and participant supervisors was much less frequent and tended to be driven by specific issues or problems rather than processes or protocols.

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[10] In some cases this meant on the reservation but in another city or town, in some cases it meant off of the reservation entirely, and in some cases it meant simply "far enough" so that case managers would be unlikely to run into participants locally.

[11] None of the employers with whom we spoke indicated that their contact with the agencies or departments coordinating OJT programs had been a burden, and some indicated that they would have preferred *more* contact with program staff.

The quality of interaction between case managers and participants and case managers and supervisors also varied considerably. Interviews with participants, employers, and case managers, together with case file reviews, revealed inconsistencies in the objectives of such contact as perceived by all of the key stakeholders, as well as differences in the information shared during contact. Not surprisingly, contact was most often initiated by the case managers, rather than the participants or the OJT work-site supervisors. Case managers approached these interactions in a variety of ways. Case managers who adopted a more hands-on approach to monitoring OJT programs tended to contact participants and supervisors separately (but at the same time intervals) and ask similar questions to each respondent at each interval. Common questions addressed participants' progress, job satisfaction, unexpected challenges or difficulties, milestones, as well as participants' overall physical, mental, and emotional health. The case mangers then compared the responses to ensure that they were reasonably consistent, and offered congratulations, words of encouragement or intervention services as needed.

Alternatively, some case managers contacted participants on a regular basis simply to ensure that they were still working with the same employer. This level of contact produced little more than a verification of employment status for a case file. However, most case managers take a more moderate approach than either of these two extremes, contacting participants more frequently than their supervisors and maintaining a willingness to provide additional support or intervene as needed.

For these case managers, the challenge lies in knowing when intervention or extra support is necessary or advised. This requires both a quality training plan and ongoing monitoring of participants—neither alone is sufficient. For example, in one case participants in an OJT program that was designed to train them in basic office skills were increasingly asked to perform heavy lifting and other duties associated with the day-labor side of the business—where participants tend to be higher paid—to the exclusion of their formal training in office procedures. From the perspective of the employer, this was perfectly legitimate because he was both using personnel resources more effectively (when there was no office work, participants were reassigned as needed) and exposing participants to a broader menu of skills than just those associated with office procedures. Since the participants liked their boss and their jobs, they responded positively to case managers' inquiries. If a quality training plan were guiding the OJT program and the questions asked by the case manager, the case manager may have been better able to assess the situation and identify the problem. Instead, the participants continued on in their OJTs where they were ultimately trained in a random mix of tasks that lacked coherence. This lack of formality prevented the participants from assessing their own progress as they moved toward specific objectives. They were ultimately well prepared to work in their current setting, but the absence of more specific skills training may ultimately prevent them from moving into positions of more responsibility, or those that better suit their personal and professional needs.

Another benefit of developing effective training plans *and* establishing a good rapport with participants and supervisors is that it serves to prevent much of the abuse that many grantees fear. A common form of employer abuse with regard to OJT programs has been the refusal of employers to hire OJT participants at the conclusion of their training. However, a training plan that focuses on teaching participants the skills most in demand at the firm or organization, together with sufficient monitoring and support to ensure that participants master those skills, can serve to make participants valued staff members by the conclusion of the OJT and reduce the likelihood that the employer will seek to terminate participants' employment.

Employer abuse can also take the form of inattention to the training plans developed as a part of participants' OJT programs. In such cases, employers might hire an OJT participant for a specific position or area of expertise. However, rather than following the training plan and ensuring that the participant learns what is required for the permanent position, the employer might place the person wherever there is a shortage of help. The participant functions like a temporary worker. This strategy benefits the employer by enabling him or her to collect a training subsidy without providing much training. The participant benefits from the wage, but does not receive training consistent with the original OJT design. Again, in these cases, a quality training plan, combined with an appropriate level of interaction between the case manager and participant, and the employer and case manager, can prevent such intentional misuse of the OJT program or unintentional misunderstandings of a similar nature.

Finally, another form of employer abuse that reportedly impacted grantees' willingness to provide OJT programs for participants was the potential for employers to offer a lower than market-value wage to OJT participants. Again, a quality training plan, together with an appropriate level of staff involvement in the design and implementation of the OJT program, can ensure that the employer, the participant, and the grantee are satisfied with the program and its outcomes.

Serving participants with diverse skills and experiences offers opportunities for high-quality matching of employers and participants, marketing OJT to a wide variety of employers, and promoting career-advancement and self-sufficiency among participants. However, high-quality OJT programs can absorb administrative time. Developing protocols and processes and ensuring that staff are appropriately trained can streamline the process and help grantees meet the specific needs of individual participants and employers, as well as the needs of the larger Indian community.

Approach #2: Arranging OJTs in Targeted Industries

Grantees also designed OJT programs to support a focused local strategy of economic development or otherwise limited targeting of employers or industries. For example:

- *Local economic development strategy.* In some areas served by tribal and non-tribal grantees, employment and training providers had established relationships with economic development entities and employers to promote particular economic development strategies, such as targeted-industry development. As a result, the employment and training providers, including the JTPA entities, tended to develop programs and services that would support this development by recruiting and training individuals with specific skills and aptitudes.
- *Limited targeting of employers or participants.* Some grantees have (explicitly or informally) identified either specific employers (e.g., the largest employers in town) or specific types of employers (e.g., those within a target industry or those lacking in sophisticated human resource supports), and then recruited participants and developed OJTs to meet the needs of those employers.

Typically, multiple OJTs were developed for these positions, either simultaneously or consecutively. The experiences of grantees using this approach to design and deliver OJT services are discussed in this section.

Recruiting Participants. Grantees arranging OJTs with targeted employers or industries used several different strategies to recruit individuals for participation in their OJT programs. These strategies included: (1) identifying individuals with skills in demand among local employers, (2) identifying individuals with appropriate interests or aptitudes, (3) identifying individuals with an intense need for program assistance to achieve employment and employability, and (4) identifying individuals with jobs or good potential for employment who would benefit from additional assistance under JTPA. Each of these is addressed below.

Some grantees engaged in supporting targeted economic development worked with local private-sector employers to identify the skills required for available jobs. Grantee staff then referred JTPA participants who exhibited those skills, or at least the potential to develop those skills, to the OJT program. This did not necessarily mean that the participants were job ready or had attained a high-school diploma or GED, but that they exhibited the willingness or potential to learn the skills necessary to perform on the job. Employers benefited through the subsidy to support customized training and the development of a current and future workforce to the extent that OJT participants could advance in their careers.

Grantees also recruited participants who demonstrated an aptitude or interest in careers with employers who had available jobs. These individuals did not necessarily possess the skills required by local employers when they enrolled in the JTPA program, but they may have demonstrated a good work ethic or some general knowledge of employers' industries.

Some grantees targeted the individuals most in-need of services for participation in the JTPA program. In such cases, individuals referred to the OJT program were generally expected to learn general work skills in addition to skills associated with their particular positions. In such cases, there was no expectation that the individuals would remain in the same career area. However, the OJT and subsequent work experience was understood as crucial in enabling them to find subsequent work.

Finally, some grantees sought to support training among their working or work-ready participants for whom training might otherwise not be available. In some cases, these individuals were referred to the JTPA program *after* they had already been hired (reverse referral), and, in some cases, participants were referred as a condition of their hire. Grantees who recruited OJT participants through these methods reported that this training helped participants to advance and helped establish a good rapport between the grantee and participating employers.

Using Assessment in Designing Services. We found that the role of assessment to design OJT services when participants exhibited similar skills and experiences varied enormously from grantee to grantee, from agency to agency within the same grantee, and from employer to employer (many grantees use employers assessments to inform their selection of OJT participants). In general, there was more emphasis on specific skills assessment among grantees using this approach than those serving a more diverse participant base; however, this may have been because these grantees tended to recruit multiple participants (in the case of targeted industry development) rather than one at a time. As a result, skills assessments, either the grantees' or the employers', were often used as "screens," permitting grantees to refer participants who did not pass to other JTPA activities. On the other hand, however, when participants were referred to the JTPA program by their employers, there was rarely an assessment conducted by the grantee at all because it was assumed that the employer was generally satisfied with participants' skills.

One challenge that grantees using this approach faced in assessing participants' skills was ensuring that *their* needs and interests, in addition to those of the employers, were taken into account in developing OJT programs. Because grantees used OJTs in supporting targeted economic development in their local communities, they were frequently placing more than one OJT participant with an employer at the same time. Because the OJT program is often perceived as an effective way to market the entire JTPA program to employers, grantee staff reported feeling pressure to make the needs of employers a priority, because there were typically so few of them (and so few jobs) in their local service areas. This pressure resulted in staff placing participants in OJTs who may not have been interested in or prepared for these programs. Grantees face the challenge of ensuring that participants understand the nature of the job and are prepared for work *before* they are enrolled in OJT programs.

Developing an Appropriate Service Mix. Like grantees using the first approach—targeting work-ready participants for diverse OJT positions—grantees targeting specific industries or employers also tended to design OJT programs as stand-alone activities or paired with classroom training. These grantees perceived the OJT training program, particularly when it was paired with vocational training, as a means of supporting the development of a local workforce skilled in areas in demand among local employers. For example, one grantee providing services in an area dominated by the tourist industry worked with a local training provider to develop curricula in hospitality and customer service. The grantee then designed OJT programs for participants interested in this industry that combined a component of CRT with their paid OJT work. Not only were participants prepared for their entry-level jobs, but the training they received prepared them for career paths in the industry.

Moreover, for grantees providing OJT services to employers in areas dominated by a few industry clusters—timber, tobacco, manufacturing, etc.—the OJT program can serve as a means of recruiting additional employers if the grantee was able to establish an effective track-record in placing qualified candidates in these industries. The OJT program also offers grantees (or service providers with whom grantees coordinate) the opportunity to build their capacity to provide customized training to meet industry or employer needs. For example, another grantee serving an area with very few employment opportunities developed an OJT program for a new employer in the service industry. The program enabled the employer to hire a qualified workforce for the employer's grand opening. When another (service-oriented) business located next-door, the newer employer was referred to the JTPA program by the original employer. While few grantees had identified this practice as a specific employer recruiting strategy, the practice appears promising.

Developing Appropriate Service Length/Intensity. Grantees using this approach to designing OJT services also varied the length and training time associated with OJT programs. However, cost, rather that the needs of individual participants, was most frequently offered as a rationale for placing these limits on programs. These grantees found that limiting the total reimbursement amount, or total number of hours in which participants could be enrolled in OJT programs, was effective in reducing the overall cost associated with the program and transitioning participants to unsubsidized work more quickly than the six-month allowable time frame associated with the program. For example, one grantee limited OJT contracts to $1,300 (the average length was about six-weeks), combining the OJT with a informal on-site group instruction, which enabled the site to offer OJT services to more employers and participants. Alternatively, some grantees limited the number of participants they would enroll in an OJT program on an annual basis. Within these limits, there was a modest effort to vary training contracts to participants' needs.

OJT Training Plans/Content. Grantees that emphasized OJT contracts designed to support industry development or meet the specific needs of employers were also required to develop training plans for participants as a part of the program, consistent with the requirements for OJT in JTPA. Since most grantees using an employer-focused approach worked with core industries or groups of employers on a regular basis and developed programs for the same types of positions, the OJT programs developed in this context were generally well-established and institutionalized. When participating employers identified a hiring need that could be addressed through an OJT, their JTPA liaison would identify an appropriate candidate, and then, rather than developing a training plan from scratch, the staff person was likely to base the new training plan on a previous one developed for another participant—some grantees developed "templates" for OJT contracts and training plans, and simply inserted participants names in the blank spaces. Participants and staff involved in these types of programs typically spoke of them as if they existed independently of the participants—participants, in particular, had a sense that there was a pre-existing program in which they were placed, not that the program was designed around individual participants. New participants coming into OJT programs where grantee and employer relationships were institutionalized experienced a number of benefits. These included: (1) regular and ongoing communication between grantee staff and employers (reducing the chance of misunderstandings or problems between these two stakeholders), (2) employer experience in providing training using the OJT program (improving the likelihood that the training would be meaningful and ongoing), and (3) the potential for mentors at the work-site who had also gained employment by participating in the OJT program.

Although relying on current relationships or using prior training plans to design OJT services for participants is an efficient use of staff time and program resources, grantees using this strategy face the challenge of balancing the needs of the program, the participant, and the employers to ensure that the needs of all of the key stakeholders were addressed in the most resource-efficient and effective way. For example, several grantees had been working with employers for so long that the employers either trusted the grantees to develop quality plans, or encouraged them to use training plans developed for other participants who had completed similar programs. In some cases, this is appropriate—it is a good use of program resources and meets the needs of the employer and the participant. However, in other cases, it resulted in no formal training plan at all—participants were not clear on the skills they intended to learn or what was expected of them on-the-job, and when problems arose, their files contained no documentation that could assist the grantee staff, participants and employers in revising their programs. Challenges that might have otherwise been turned into learning experiences remained problems and compromised relationships between the key stakeholders.

OJT Programs for Multiple Participants Some grantees providing OJT services targeting to specific industries and employers developed OJT programs that were designed for *groups* of participants rather than individuals. For example, several grantees worked with employers in seasonal industries—such as construction or tourism—that tended to hire *en masse*. Other grantees targeted new or expanding employers that also planned to hire more than one participant. Still other grantees targeted specific groups of participants—women with experience caring for children, for example—and worked with multiple firms in the same industry to place them. When grantees worked with multiple firms in a single industry or with employers seeking to hire groups of new workers, they tended to develop OJT programs designed to serve multiple participants simultaneously.

For example, one grantee worked with a new employer to meet the majority of the incoming firm's human resource needs. Since the firm required about 20 similarly qualified individuals for a single job category, one program was designed for these 20 individuals, and a single contract was signed between the employer and the tribe, with each individual participant signing and receiving her or his own copy of the contract. Another grantee worked with a community college to design a curriculum that would meet the needs of the tourism industry. In this case, individual contracts were developed, and the on-the-job components of the programs were customized, but participants received identical instruction in the basic skills required as a part of the industry.

Grantees reported a number of benefits resulting from this strategy, including: (1) the increased likelihood of comparable training for participants, (2) increased involvement among local employers in developing OJT and other JTPA programs, and (3) increased efficiency in use of program resources. Each of these is addressed below.

- *Comparable training for participants.* When grantees, contracted service providers, or employers develop training for *groups* rather than individual participants, they tend to offer a more formal and institutionalized training program than they would provide for a single participant. This ensured that participants were comparably qualified to assume the jobs for which the training was developed and made the transition to work easier on participants and employers.

- *Involvement of employers in developing programs.* Employers hiring groups of new workers had a greater stake in the hiring and training process than they would have if they had been hiring only a single participant. As a result, these employers tended to be very involved in the development of OJT contracts and the provision of training. Grantees reported that employer involvement tended to increase the overall quality of the OJT experience and develop the capacity of the grantee to assist employers in meeting future hiring goals.
- *Efficient use of program resources.* Grantees reported that, although group-based OJT programs were labor-intensive up-front (developing a training plan that meets employer, providers, grantee, and participants' needs), they were an efficient use of program resources because grantees did not have to develop discrete and unrelated contracts and training plans for each individual served, and because of the anticipated program outcomes—*multiple* participants placed in living-wage jobs.

Grantees also noted some of the challenges they face in developing group-based OJT programs and training plans for their participants. These challenges included: (1) the tendency for programs to become "formulaic" and inflexible, (2) the tendency for grantees to rely on a limited number of employers with whom relationships have become institutionalized, and (3) the tendency for grantees to rely on communication with employers, and not participants, to monitor the performance of OJT programs. Each of these is addressed below.

- *Formulaic programs.* Some grantees reported that they relied heavily on previous contracts and training plans to develop new contracts and training plans with the same employers or with new employers in the same industry.[12] While this is cost-savings, steps must be taken to ensure that these documents are appropriate and useful, lest grantees compromise the experience for the participants or employers.
- *Limited number of employers.* Some grantees worked to establish high-quality relationships with a limited number of employers served by their programs. While these employers served as reliable customers, some grantees were almost entirely dependent on a few employers or a single industry to provide jobs for their program participants. This narrow targeting reduced the choices for participants who were interested in other career opportunities but who were nonetheless encouraged to pursue jobs with the core group of employers.

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[12] We saw one instance wherein a contract was developed on the basis of a previous contract with a different employer, but the employer's name had not been changed throughout the document—the contract included the name of an employer that was not involved in the OJT program.

- *Over-reliance on employers to assess program.* When the employer was providing training for multiple participants, grantee staff tended to rely on the employer to assess participant progress and performance, rather than contacting the individual participants. Unfortunately, however, employer assessments were not always consistent with those of participants.[13]

Grantees that developed group-based OJT programs reported that they can be very effective tools for ensuring that JTPA participants benefit from new or expanding economic or industry development.

Support, Supervision, and Oversight of OJT Activities. In general, grantees (or agencies or staff) that developed OJT programs for groups rather than for individuals, or used OJT as a strategy for supporting targeted industry development, had less frequent contact with their participants than grantees that focused on the development of individual OJT programs. Grantees cited several reasons for this. First, participants were rarely placed in employment situations that would make frequent contact with their case manager probable. For example, group-based OJT programs were almost never developed for tribal departments or agencies, because such agencies rarely had a need for multiple new employees for a single or even a few job categories. As a result, case managers were unlikely to "run into" participants in the same way as was common when participants were hired, via OJT, by tribal or grantee agencies or organizations on an individual basis. Although some participants did not require additional assistance or follow-up contact from their case managers after placement in their OJT programs, others would have benefited from a more formal follow-up approach.

Second, participants working in group situations tended to rely on each other for support rather than solely on their case managers, and they thereby initiated contact with the case managers less frequently than participants in individual OJT slots. When OJT participants trained and began new jobs in groups, they tended to develop mutually supportive relationships among themselves rather than relying on their case managers. Moreover, larger group-based OJT program tend to be more institutionalized—the employer may have strategies, such as mentoring or frequent staff or team meetings, to prevent conflicts or address issues as they emerge. This reduces the frequency of participant-induced contact with case managers.

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[13] In reviewing participant files, we saw evidence of program staff contacting employers (but not the participants) and assessing the participants' progress on that basis.

Finally, case managers tended to use the employer as the primary point of contact for participants completing group-based OJT. Because the employer representative was the single point of contact for all of the OJT participants working at that site, case managers were able to generate a great deal of information in one simple phone call. However, contact with the employer alone is insufficient. For example, one grantee reported that an OJT participant who won rave reviews from her supervisors quit unexpectedly. Later the case manager discovered that the individual had transportation challenges that could have been resolved if she had made them known to her case manager. The case manager had been in contact with the employer, but not with the participant, and did not anticipate the problem. A review of case files among all of the grantees we visited revealed that frequent contact with employers participating in OJT programs was not matched by corresponding contact with individual OJT participants, particularly in group-based programs.

Like grantees that emphasized the development of individual OJTs, the *quality of interaction* between grantee staff and participants in group-based OJT programs varied widely. Interviews with grantee staff, participants, employers, and reviews of case files revealed that, in some instances, this interaction was thorough and meaningful, while in other cases, it was only cursory. In some cases, quality of interaction was correlated with frequency of contact. For example, some case files revealed that case managers contacted participants often and solicited important information each time. In other cases, interaction that was infrequent nonetheless yielded significant and important information.

In general, the grantee staff conducting follow-up on participants in group-based OJT programs had an advantage, because the participants' training plans tended to be well-developed and institutionalized as compared to most individual OJT training plans. These training plans often served as a protocols for guiding case-manager and participant follow-up discussions—case managers were able to ask participants about their general satisfaction and progress, but also address specific competencies in an effort to ascertain whether participants were meeting their training goals.

Compared to the first approach (developing OJTs for individual slots), developing *group*-based or targeted OJTs also did not appear to pose as much of a threat of employer abuse. At least, grantee staff rarely mentioned the issue. This suggests that group-based OJTs offer some protection from employer abuse because they tend to emphasize employer involvement in program design, leading to more customized training, better prepared employees, and greater satisfaction on the part of employers and participants. Moreover, the numbers of participants the JTPA programs can access, combined with the programs' ability to put resources into training, give the JTPA program some leverage in negotiating wages for trainees and determining an appropriate length of training—these factors also diminish the potential for employer abuse.

This second approach offers grantees the ability to closely link employment and training program development to local economic development, thereby promoting dual-track outcomes: a well-prepared labor force and employers offering living-wage jobs. The challenge lies in ensuring that the program serves *all* community members, and not just those interested in a particular industry or employer. Because particular employers are likely to present themselves as a reliable source of employment opportunities, grantees may be eager to meet these employers' needs by identifying appropriately skilled individuals. However, Indian communities, like all communities, maintain diverse membership and requires diverse economies in order to thrive. Grantees can use their programs not only to support successful and growing employers or industries, and their labor forces, but also to support a wide array of small business thereby serving a more diverse group of employers and individuals within their communities.

WORKSITES ASSOCIATED WITH OJT PROGRAMS

Unlike the WEX and CSE programs, participants in the OJT programs, regardless of the grantees' design approach, were much more likely to be placed with private-sector employers or tribal-owned enterprises than in Tribal agencies or departments. Although the employers varied in size and industry across the grantees in our sample, they fell primarily into three different categories: (1) tribal enterprises, (2) Indian-owned firms, and (3) other employers.

Several grantees used their OJT programs to support the development of tribal enterprises as a target industry. In some cases, grantees supported a single tribal enterprise, such as tourism or gaming. For example, one grantee used its OJT program to train participants for positions in the tribe's gaming facility. The OJT program trained participants in both the skills they required to perform their jobs and in communication skills and tribal history—because the participants were placed in an industry supported by tourists, they required a solid knowledge of the tribe's culture and tradition. Another grantee worked with a training provider to develop a course designed to train participants for working in the tourism industry more generally. Some of these participants were enrolled in OJT programs with a tourism information center, and were co-enrolled in a course where they trained both in skills specific to that industry and skills transferable across other industries (e.g. accounting skills).

Other grantees used OJTs to support the development of a variety of tribal enterprises, rather than a single industry. For example, one grantee developed OJT programs in two small, tribally-owned retail facilities, and an economic development agency. Although only one participant was placed in each establishment, the placements clearly benefited the employers, the participants, and the communities because they addressed so many needs simultaneously—participants were placed in living-wage jobs with opportunities for advancement, employers were able to hire trained, enthusiastic employees, and communities witnessed improved capacity (and in some cases, performance) among their local businesses. Examples of other tribal enterprises that provided training opportunities of OJT participants include child-care facilities, public services, and manufacturing.

Grantees also targeted Indian-owned firms as potential recipients of JTPA services, and OJTs in particular. This was especially true among non-tribal grantees located in urban areas. These grantees reported that targeting Indian-owned firms fulfilled two objectives consistent with their overall program goals (1) supporting the growth of Indian-owned firms, which were generally small and appreciative of assistance in meeting their human-resource needs, and (2) offering participants opportunities for a work-life influenced by Indian culture (even if a different Indian culture from their own). Moreover, grantees also reported that many Indian business owners sought to "give back" to the Indian community—participating in the JTPA program via OJT was a good way to accomplish this.

Finally, some grantees did not work with specific groups or types of employers, but attempted to develop OJT programs when they could create a good match between the employers' needs and the participants' skills. In these cases, employers were not necessarily Indian-owned (or at least were not participating *because* they were Indian-owned) nor did they represent a particular field or industry. Rather, they were employers with varied hiring needs that either sought assistance from the grantees or were recruited by them. For example, one grantee worked with a small publishing house. This employer found working with the grantee to develop OJT programs made good business sense because it kept hiring and training costs low and because the employer valued diversity in staffing the firm.

Although, collectively, grantees offered a wide variety of types of OJT programs, most individual grantees reported that they relied on a small number of employers, or similar types of employers, with whom they had worked in past program years. In general, grantees expressed frustration at the difficulty of attracting new employers. This suggests that (1) marketing services to employers and (2) facilitating collaboration between employment and training agencies and economic development agencies as potential areas for technical assistance.

OUTREACH AND RECRUITMENT OF EMPLOYERS

The OJT program demands that grantees conduct outreach not only to participants, but to employers as well. Grantees using both service approaches—arranging OJTs with diverse employers and targeting specific industries or firms—faced numerous challenges in conducting effective outreach to employers who could provide OJT opportunities to participants.

Nonetheless, the challenges tended to be somewhat different, as did successful strategies for overcoming them.

Strategies for Those Providing OJTs with Diverse Employers

In general, grantees attempting to provide OJTs in diverse slots experienced somewhat more difficulty in recruiting employers. These grantees, in an effort to meet the specific needs of their participants, attempted to identify OJT opportunities with a wide range of employers. They generally used their Indian networks as a base from which to recruit employers and planned to expand their range of participating employers using these networks. Some grantees developed long-term relationships with a cadre of employers that regularly hired or trained program participants. However, many grantees were not successful in expanding their networks beyond the Indian-owned firms. In several cases, these grantees were located in high-growth, low unemployment areas, but were not successful in taking advantage of the good labor market to place participants in high-quality jobs.

Staff reported that there were several reasons their participants were unable to reap the benefits of this economic growth including:

- *Participants lacked skills in demand among local employers.* Grantee staff reported that, although there were many employers with openings claiming that they "will train/no experience necessary," employers still required some work history or demonstration of past performance that participants were unable to provide.
- *Participants prefer to work with Indian-owned employers.* Grantee staff indicated that this was particularly important in urban environments, because Indian people who relocated from reservations placed a high value on working in an environment in which their cultural norms and practices were valued. However, there were few Indian-owned firms in most areas, and few opportunities within those firms were available.
- *Participants' residences were far from areas of high job growth.* Grantee staff indicated that even in urban areas with overall high growth, pockets of poverty exist where the unemployment rates are much higher. These are precisely the areas in which participants are likely to reside. Because they are often forced to leave their urban communities for work, transportation issues emerge as a problem.
- *Employers were reluctant to work with grantees.* Grantee staff also reported that racism among employers persists and has prevented them from developing employer relationships outside the Indian community.

These challenges are formidable. However, some sites developed strategies to overcome them, suggesting that they can be overcome among other grantees in similar contexts.

Bridging Employer-Participant Skills Mismatch. When participants lack the skills in demand among local employers, the JTPA program can serve as a bridge enabling participants to obtain those skills so that they are qualified for available jobs. Programs have demonstrated their ability to bridge this gap by developing their own training or by working with a contracted training provider, combining CRT activities with work-based learning. For example, one grantee developed an OJT program for an individual interested in accounting. The program played an important role in connecting the participant and employer to seminars and other training opportunities available in or near the worksite.

In addition, employers with whom we met as a part of the evaluation indicated that work-readiness was their foremost concern. This suggests that if JTPA programs can develop effective ways to assess participants on the skills employers want, prepare participants for work, and then provide technical assistance to employers interested in providing additional training, employers may be more receptive to providing participants with training in specific skills or on an ongoing basis. OJT programs can serve as an important means toward that end.

Working with Indian-owned Firms. We heard a great deal about participants' preference for Indian-owned firms. This is a tremendously complex issue. There is certainly value in placing participants in Indian-owned firms, particularly participants for whom it is important to work in an environment influenced by familiar cultural norms. Yet, there was evidence among some grantees that participants' choices were severely limited by this practice. Some grantees directed participants to employment opportunities with Indian-owned firms offering only poverty wages, rather than searching more broadly for opportunities with a better chance of assisting Indian families in achieving self-sufficiency. Alternatively, other grantees directed participants to employment situations that forced them to travel long distances or work odd hours in order to work in an Indian-owned firm.

For example, we interviewed one participant who had been placed in an Indian-owned firm far from her home. She was forced to travel one hour on two buses each way for a wage of $5 per hour to work in the cleaning business, when just a short bus ride from her home (and very near the grantee's offices) was a shopping mall advertising positions for $7 per hour, and a gourmet market (with a diverse staff) offering $10 per hour. Since these employers were not Indian-owned, however, the grantee did not market services to them. This participant finished her OJT program, but when her employer, a dry-cleaner, offered her a full-time job, she refused, citing her commute and the cost of childcare as major barriers.

While this was an extreme case, it was not isolated. We heard similar stories from other participants, and saw evidence of it in case files. We interviewed participants who did express an interest in working for Indian-owned firms; however, for most of these participants, this was one of many interests. It is understandable that grantees would want to provide their services to Indian-owned firms, but they face formidable challenges in developing effective matching and screening procedures to ensure that the programs meet the needs of *both* employers and participants. Moreover, the grantees always want to take into account the *comprehensive* needs of participants, considering all potential consequences or unintended outcomes.

Moreover, many non-Indian employers are actively seeking to diversify their workforces to better represent their communities and serve their customers. The INA grantees could play a vital role in bridging this gap by building the capacity of employers to better foster diversity in the workplace and by helping participants understand the norms of working in a variety of different environments. This in no way precludes or even undermines the practice of serving Indian-owned employers, but enables the grantees to play a unique and important role in improving the lives and livelihoods of participants, and educating majority communities about Indian values and traditions.

Mismatch between Participants' Localities and Location of Available Jobs. The mismatch between the location of jobs and the location of available labor is a plight faced by many high-growth urban areas. Recent scholarship on the subject has generated considerable attention.[14] This suggests that other organizations providing services to individuals seeking work face similar transportation and other challenges arising from this "spatial mismatch." Improved partnerships with other such providers may be one way to generate solutions to these shared challenges. For example, one grantee began to convene community meetings between the representatives from tribal programs and representatives from the three surrounding small towns at the tribe's Family Center. Although not the intent of selecting the venue, attendees, including representatives from the local school boards and community colleges, became more familiar with the routes on the reservation and could help plan more efficient use of shared vehicles (e.g. school buses) or commuting for more than one purpose.

Employers Reluctant to Work with Grantees. Numerous grantees pointed to racism as a major barrier to recruiting new employers. Undoubtedly, this phenomenon frustrated numerous grantees, despite their efforts to the contrary. However, there were additional reasons cited by employers, and in some cases, grantee staff, for the difficulties that emerged when grantees attempted to market OJT services broadly (e.g., outside the Indian community). First, employers who had worked with tribal grantees (and several grantees themselves) reported that, in some cases, bureaucracy was responsible for employer reluctance. In some grantee agencies, each OJT contract had to be reviewed by a governing or advisory body associated with the tribe. This was time consuming, and in one case, resulted in a lost opportunity to place multiple participants in good jobs because the employer, who needed employees immediately, was forced to hire independently of the grantee to support business operations. Ideally, reviews of administrative procedures can be conducted among the grantees for whom this is a problem, to streamline the process and avoid future misunderstandings.

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[14] See, for example, William Julius Wilson, *The Truly Disadvantaged*.

Second, employers reported that the paperwork associated with the OJT program was burdensome. However, staff experienced in writing OJT contracts can help facilitate the paper-trail and ease the burden placed on employers, while ensuring that participants needs are not sacrificed in the process. Third, some employers and some participants expressed dissatisfaction with their placements. Again, well-trained JTPA staff who can conduct high-quality assessments that are not burdensome to participants can play an important role in ensuring a quality match and generating mutually agreeable expectations on the part of employers and participants.

Finally, as discussed previously, grantees can play a role in reducing racial barriers by demonstrating high-quality program outcomes for participants and employers, bridging miscommunication between employers and participants, conducting outreach into the non-Indian employer community about the services available through the grantee, and establishing partnerships with other service providers. These strategies can help grantees serve their communities better by enabling participants to access additional services provided by partner agencies and providers, and by improving the range and quality of employment and training opportunities available through OJT (and other JTPA) programs.

Strategies for Those Arranging OJTs in Targeted Industries

In general, grantees using OJTs to support the development of targeted industries had less trouble recruiting employers because: (1) employers were often tribally-owned and used the JTPA program as its first source of hire, and (2) employers that had success with the JTPA program marketed it to other employers—because *industries* were targeted rather than individual employers, word traveled quickly.

Nonetheless, these sites, too, offer lessons in developing ways to reach new employers and develop new OJT opportunities for their participants. Their strategies included: (1) working closely with the local or tribal economic development entities, (2) focusing on the development of tribal enterprises or tribal agencies providing essential services (medical, elder care, etc.), (3) identifying home-based business owners that could serve as mentors and provide short-term work-based learning opportunities for participants, and (4) developing work opportunities in nearby urban areas and ways to support groups of participants in taking advantage of them.

- *Working with economic development entities.* By working closely with the economic development entities (local or tribal), grantees could plan to meet the needs of businesses being recruited into their service areas by ensuring that work-ready participants were available. Moreover, grantees could help facilitate local efforts to develop targeted industries in their areas that offer participants current and future employment opportunities.
- *Focusing on tribal enterprises.* By focusing on the development of tribal enterprise, grantees can help support their tribes' ability to prosper within their local areas and reservations. OJT is a particularly effective strategy toward this end because grantees can concentrate on institutionalizing effective OJT programs with a few employers likely to offer jobs and opportunities for advancement on a continuing basis. For example, one grantee provided services to a successful timber enterprise, and was able to offer participants opportunities at every step on their career-ladders because there was consistent promotion, advancement, and overall business growth. Other tribes pursued this same strategy with their gaming industries.
- *Working with home-based business owners.* Although we did not find examples of JTPA programs working with home-based businesses, plans for such coordination were emerging at several sites. One site, in particular, was aware of several local artists who made textiles to sell during Indian festivals and at craft shows. Although many participants knew basic skills associated with this trade, few had experience handling the business side. Since it is a seasonal business, JTPA staff were attempting to develop an OJT program whereby a participant would assist these artists in their trade and in the management of their businesses (finance, marketing, distribution, etc.) during their busy seasons, in hopes that these OJT participants would be interested in starting their own businesses.
- *Developing off-reservation opportunities.* In areas with minimal opportunities for employment on-site (on the reservation or locally), some grantees were exploring ways to develop OJT programs for groups of participants who could then travel together to their places of employment and return home together as well. This strategy would enable the participants to earn higher wages than they would locally, and would allow them to remain living "at home" (whether on reservations or in urban communities) and commute with a community of peers.

The diversity in approaches and outcomes makes it impossible to provide an overall assessment of recruitment and outreach vis a vis the high-quality model of services. However, the relative lack of knowledge about strategies used by other sites, combined with the overall enthusiasm for peer-to-peer sharing as a means of technical assistance demonstrated by grantees (as discussed in Chapter III), suggest that additional opportunities for communication between grantees and grantee staff would benefit INA programs, and OJT programs in particular.

QUALITY DESIGNS FOR LEARNING OBJECTIVES AND MONITORING

The OJT program is one the most difficult to implement well, because it requires significant and ongoing coordination between the participant, the employer, and grantee staff. The program is particularly difficult to implement in areas served by INA grantees for many of the reasons already cited throughout this report, including: (1) the absence of private-sectors employers, (2) the lack of infrastructure that could enable participants to reach jobs, (3) the inadequacy of funds available to serve all eligible customers, and (4) the importance of cultural context and values in the workplace and community. However, many grantees have developed strategies that enable them to provide OJT services consistent with the model of high-quality services described in Chapter I, despite these challenges. Some of these strategies have been discussed throughout this chapter, including methods for recruiting employers, developing sound training plans, and so on. In general, however, the development of *clear training objectives* and the provision of *effective supervision* proved the most difficult for grantees to implement well.

Developing Clear Training Objectives

Much of the difficulty grantees experienced in developing clear training objectives for OJT programs arose from their local contexts. For grantees that provided OJTs under very difficult employment conditions, determining clear training objectives proved a challenge because grantees were never certain that employers would offer work to participants at the completion of their training programs, despite the fact that this was written into the OJT contract.[15] Grantee staff writing OJT contracts under these circumstances wanted to ensure that the participant learned enough to become valuable to the employer, who would then be more likely to hire the participant, but also learned more general transferable skills so that the participant would be better able to secure work elsewhere. This was a difficult challenge and sometimes resulted in training plans that were unclear or difficult to follow from either the employer's or participant's perspective. Grantee staff must work closely with employers and participants to strike a healthy balance and coordinate with other tribal entities to the extent possible, to enhance the ability of employers to follow through with hiring commitments.

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[15] In some cases, this was clear abuse of the OJT program on the part of employers. However, in other cases, a downturn in the local economy made it impossible to hire participants even after they successfully completed training.

Service approaches used by the grantees also created challenges in establishing training objectives. For example, grantees providing OJTs with diverse employers faced difficulty in establishing clear training objectives because of the time constraints of program staff. Because staff were working with multiple and diverse employers, the time grantee staff could spend with individual employers was reduced. In some cases, this meant that once the OJT contract was signed, grantee staff were not always able to follow-through and develop high-quality training plans. As a result, employers had greater control over the training in which participants engaged. Employers that had developed effective training practices ensured that participants received high-quality training. However, other employers did not establish formal training programs at all. Grantees face a challenge in allocating adequate productive time to spend with employers and participants involved in OJT programs to ensure that those programs run efficiently and produce intended outcomes.

Similarly, grantees supporting targeted industry development faced parallel challenges in identifying clear training objectives. Because OJT programs developed to support industries tended to evolve into a situation in which employers made a specific number of "slots" available for participants for a given period of time, the training plans themselves tended *not* to be particularly individualized. Although the arrangements did tend to be institutionalized—employers were familiar with the requirements of providing high-quality training and developed processes through which this could be accomplished—they did not necessarily require that individual training plans be developed. As a result, when participants may have desired specific outcomes from their training programs, they were not necessarily accommodated.

Supervising OJT Participants

Regardless of their approach, grantees were challenged in their efforts to develop effective methods with which to supervise participants, or coordinate with participants' on-site supervisors, to ensure that participants' particular needs and aspirations were taken into account in implementing their OJT programs. The high-quality model suggests that effective supervision may take the role of coaching or mentoring. Several of the participants with whom we met indicated that such mentoring had taken place during their programs. However, we found little evidence to suggest that grantee staff played a role in facilitating this process. Although grantee staff may take a minimal role in following up to ensure that supervision of participants is effective among employers for whom this practice in common, they could certainly play an important role in building the capacity of other employers to promote these practices.

SYSTEM LEVEL INFLUENCES ON QUALITY OF OJT PROGRAMS

Funding constraints and the community context loomed as two important system-level factors that influenced the use and quality of OJT.

Funding Levels

Perhaps the most significant impact that funding—specifically, decreased funding over time—has exerted on grantees is that it has forced them to make difficult choices about the use of resources to support their programs. OJT in particular has been negatively affected because (1) it is perceived as an expensive program among most grantees because of the wage reimbursement, and (2) it can be paper-intensive, and therefore labor-intensive, which makes the cost of administering the program potentially burdensome as well. As noted previously in this chapter, inadequate funding was the number one issue cited as a barrier to providing OJT services among grantees that did not offer OJT, and two of these sites had recently eliminated the service as a specific response to budget reductions. Among the grantees that do offer OJT services, funding was also cited as a constant challenge in providing these services.

However, many of these same grantees acknowledged that they emphasized WEX or CSE programs, which can be as or more expensive, and even though OJT programs promise full-time employment after the initial training period, and therefore are more likely to facilitate participants' ability to achieve self-sufficiency. Of course, in some areas, the absence of stable employment opportunities may make effective OJTs difficult, but, even under these circumstances, OJTs may be used to support essential business development. Because grantees are interested in documenting the individual *and community* outcomes of their programs, they may benefit from considering the use of OJT in this way.

Community Context

The size, location, and characteristics of the service population and local economy have significantly impacted grantees' ability to implement high-quality programs and achieve intended outcomes. Many grantees expressed frustration at the frequency with which employers' needs changed or other problems emerged that prevented employers from following through on their commitments to hire OJT trainees. Similarly, the absence of active labor markets in many areas, or at least of employers in proximity to participants, raises viability and sustainability issues. At the same time, OJT designed to support target industries reduce individual choice.

Another difficult contextual challenge emerged among tribal grantees providing services under TERO (Tribal Employment Rights Office) guidelines. The TERO offices were often located in or near the tribal Employment and Training Offices, and staff generally worked closely together. The TEROs' mandate was to ensure that services were provided with appropriate attention to the employment rights of tribal members; the offices thus functioned much like affirmative action offices common in many other places. Because OJT services consumed significant portions of grantees' funding, the TERO staff often wanted to ensure that tribal members were served *first*. While grantee staff were unanimously supportive of TERO policies, these policies complicated the task of matching participants to jobs because grantee staff had to ensure that they placed all qualified tribal members eligible for services before they placed other eligible participants. Sometimes this caused tension in service areas characterized by high unemployment and few opportunities, particularly when the services in question were CSE, WEX, or OJT—all resource-intensive service activities.

Despite these factors, however, many grantees were able to develop creative approaches to developing and implementing OJT programs with a wide range of employers, or in support of the development of specific industries, and diverse groups of participants. Increased opportunities to share these practices may better enable grantees to learn from each other's successes and promote effective practices more widely.

OUTCOMES

Overall, the quality of OJT services and their outcomes was mixed. Grantees faced numerous challenges in implementing these programs. The most important of these, regardless of the grantee's approach or local context, was *balancing the needs of participants with those of employers, and those of the grantee* (in terms of resources and staff). When these elements were in balance, grantees were more likely to develop quality OJT programs that satisfied multiple key stakeholders. For example:

> One grantee wrote an OJT contract to train a participant to be an assistant manager of a small tribally-owned retail business. This particular program was an excellent match for the participant. Although she had limited work experience, she was highly motivated and enjoyed the opportunity to work with the public. A close relationship between her, her case manager, and her supervisor resulted in a detailed training plan, and instruction on how to ask for promotions, pay increases, and professional development opportunities. At the time of our visit, this participant had recently taken part in an out-of-state professional development program for managers. She had learned a great deal and had clearly raised the level of professionalism within the entire establishment.
>
> Similarly, we met with a participant who was working as a manager in one of the few retail businesses on a tribal reservation. She had entered her first job as an OJT participant, and was now returning to the program as recruiting additional staff for her employer. Since she had been a participant herself, she recognized the importance of working with the grantee and program participants to develop training plans. She did this in an effort to provide other program participants with opportunities similar to those she was offered. When we interviewed the OJT participants who worked for her, they indicated that they had taken active roles in their own training programs, and that their manager regularly encouraged them to take on increasing responsibility and ask for promotion and training opportunities. Although some of these participants had enrolled in their training programs without the intention of turning them into long-term professional careers, it was clear that many of them would indeed continue on career paths.

These examples point to the capacity of the OJT service activity to provide opportunities for training and potential long-term employment to participants, while simultaneously supporting the more general goals of strengthening Indian communities.

CONCLUSION

This chapter provided an in-depth look at the practice, challenge, and promise of OJT programs among the 23 grantees we visited. These sites face clear challenges in delivering high-quality OJT programs in their communities, including:

- *Challenges that arise as a result of the service environment*, such as a lack of private sector employers, underdeveloped transportation infrastructure, and a low-wage labor market.

- *Challenges that arise from circumstances internal to the grantee*, such as staff capacity issues, participants' barriers to employment, or excessive tribal bureaucracies.
- *Challenges arising from systemic factors*, such as inadequate funding, inadequate MIS support, or confusing rules and procedures demanded by the JTPA program.

However, the ability of some of the grantees with whom we visited to overcome these challenges and develop OJT programs that meet participants' needs is commendable. Additional technical assistance and peer-to-peer sharing on strategies to meet employer needs, promote community development, develop improved training plans, and conduct efficient and effective follow-up may help these grantees realize the full promise of the OJT program, and better serve a wider range of participants and employers in their communities. In so doing, grantees and participants can reap the full benefit of OJT, which can constitute a highly effective strategy for forging strong relationships with the employer community.

VIII. WORK EXPERIENCE AND COMMUNITY SERVICE EMPLOYMENT

This chapter describes two work-based activities—Work Experience (WEX) and Community Service Employment (CSE)—under JTPA's Title IV Section 401 INA program. WEX and CSE programs provide opportunities for participants to acquire occupational skills and hands-on work experience while offering them the advantage of gaining immediate income. These activities also benefit employers by providing them with subsidized labor in exchange for training participants on the job. WEX and CSE activities in INA programs are thus unique because they enable participants to enter the labor force and allow employers to utilize subsidized employment opportunities to support their human resource needs. These programs can also promote local economic growth and vitality by subsidizing staffing and training costs in tribal agencies and other public sector firms in local communities.

In this chapter, we discuss findings resulting from on-site visits to the 23 case study sites and in-depth observations of 13 WEX programs and 4 CSE programs. Our analysis is based on: the observations of worksite activities; discussions with INA program staff and worksite supervisors; and case file reviews of and discussions with current and former WEX and CSE participants. This chapter first provides an overview of WEX and CSE activities. Second, we discuss the degree of emphasis of WEX and CSE in the 23 case study sites. Third, we address the objectives of WEX and CSE among grantees providing these services. Fourth, we describe the design and delivery of WEX and CSE programs and also describe the factors influencing the program designs. We also discuss how grantees selected worksites, the types of participants enrolled in WEX and CSE, the training options available, and the intensity and duration of the service. Finally, we assess the effectiveness of these programs using the model of high-quality training.

OVERVIEW OF WEX AND CSE

The purposes of WEX programs include helping participants gain work experience and learn basic work-related skills. Work Experience assignments are typically arranged by the grantee and are generally only allowable in the public sector, including non-profit community based organizations and tribal and other governmental agencies, although in some circumstances work assignments in tribal enterprises are also permitted. Grantees typically target participants with limited work experience and place them in entry-level work assignments for a maximum of 1,000 hours in one program year. Participants can enroll in WEX for part-time or full-time employment, but the length of WEX participation varied widely among case study grantee—from several days to 26 weeks—depending on the needs of the participants and the participating employers. Participants are typically paid minimum wage for their training and all wages are paid by the grantee. Although employers are not expected to hire WEX participants at the termination of the service, grantees strongly encourage them to do so.

Several features about WEX activities in INA programs are unique. First, many case study grantees view WEX activities as the primary vehicle to develop participants' job readiness skills while earning needed income at the same time. Second, because of limited employment opportunities in rural areas, especially reservations, case study grantees often use WEX services to temporarily staff tribal agencies to relieve the strain on tribal resources. These grantees view WEX activities as beneficial to both participants and their communities because savings from staffing costs can support other community activities and services. Third, WEX and CSE programs are often the only means by which participants can gain work opportunities and acquire knowledge about demanding occupations in local areas.

Community Service Employment (CSE) is unique to Title IV Section 401 programs but, like WEX, also provides opportunities for participants to gain work-related skills in subsidized, entry-level jobs. CSE work assignments typically include work activities within the public sector but can include work related to tribally-sponsored income generating activities so long as the profits go back to tribal revenue. Similar to WEX programs, participants can work part-time or full-time and are paid at least the minimum wage by the grantee. Employers are not expected to hire participants at the end of the work assignment but, again, grantees highly encourage this.

All case study grantees offer WEX and/or CSE as service options to participants. Many case study grantees, particularly tribal grantees, that offer both WEX and CSE programs design these activities in a similar fashion, and even use the same worksites for both WEX and CSE. Other grantees distinguish these activities by the kinds of work assignments developed for participants. For example, many case study grantees use WEX assignments for entry-level employment opportunities, but reserve CSE work assignments for more experienced and job ready participants and, thus, consider CSE as a "step up" from WEX. Overall however, there is significant overlap in the design and delivery of WEX and CSE in INA programs, so we will discuss these two programs jointly, noting differences where relevant.

EXTENT OF WORK EXPERIENCE AND COMMUNITY SERVICE EMPLOYMENT

All case study sites provide WEX and CSE services, but the extent to which grantees emphasized the use of WEX and CSE varied considerably. At one extreme, grantees use these programs sparingly because these services are expensive and would absorb a large portion of the JTPA budget. At the other extreme, some grantees used WEX as the primary service option. Table VIII-1 describes the level of emphasis on WEX and CSE activities by the percentage of participants enrolled in WEX and CSE and the number of grantees offering these activities.[1]

Table VIII-1
Percentage of WEX and CSE Enrollment
by Number of Sampled Grantees PY 95

Percentage of Participants	# of Grantees Offering WEX	# of Grantees Offering CSE
0-10%	5	17
11-20%	6	6
21-40	5	0
Above 40%	7	0
Total	23	23

As the table shows, the emphasis on WEX services differed significantly across the 23 grantees. Seven grantees from our sample established WEX as a dominant service activity in which 40% or more of its participants were enrolled.[2] Five of these

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[1] Percentages of participants enrolled in WEX and CSE services are drawn from the Annual Status Report in PY 95.

[2] One tribal grantee located on a reservation enrolled 80% of its participants in WEX in PY 95. The heavy reliance on WEX stems from limited alternative training opportunities and private sector employers to support on-the-job training.

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are tribal grantees. At the other extreme, five out of the 23 grantees only infrequently provide WEX services: 10% or fewer of their terminees were enrolled in this service option in PY 95. One out of the five is a tribal entity, and the rest are non-tribal. Finally, eleven case study grantees established a moderate emphasis on WEX: 11% to 40% of their terminees received WEX. These grantees are split between half tribal and half non-tribal entities.

Based on the 23 case study sites, we found that tribal grantees tend to emphasize WEX activities more so than non-tribal grantees. For example, 5 of the 7 grantees (or 71%) offering WEX to more than 40% of their participants are tribal. At the other extreme, only 1 of the 5 (or 20%) offering WEX to 10% or fewer of their participants are tribal.

The degree of emphasis for CSE differed significantly from WEX. In general, CSE activities do not make up a significant portion of the service design within our case sample. As Table VIII-1 describes, 17 out of 23 (74%) grantees (both tribal and non-tribal) offer CSE to fewer than 10% of their participants. Six of these grantees do not offer CSE at all, because they see these services as either too expensive or overlapping significantly with WEX activities and they thus preferred not to provide CSE as a separate service activity. At the other extreme, one grantee, a tribal grantee, provided CSE to 19% of its terminees for PY 95, which was by far the highest proportion of CSE used in our case study sample. None of the sampled grantees provide CSE as their primary service option.

Grantees not emphasizing WEX and CSE programs cited the following reasons for their limited use:

- *Limited funding to support work-based activities.* Because grantees pay 100% of participants' wages for WEX and CSE activities, grantees have restricted the use of work-based activities to reduce the strain on the JTPA budget.
- *Limited subsidized work opportunities in local areas.* Given restrictions on the use of WEX and CSE, grantees have faced difficulty identifying public sector employers who have slots available. JTPA staff have faced significant challenges developing WEX and CSE positions appropriate for their participants.
- *Overlap between CSE and WEX.* Grantees that limit the use of CSE offer WEX services and feel that only one work-based activity is sufficient to address participants' work needs.

- *WEX and CSE services yield modest outcomes.* Although WEX and CSE positions provide immediate income for participants and have the potential to increase participants' occupational skills, the lack of assured job placements at termination deterred some grantees, particularly non-tribal grantees, from focusing on their use.

By contrast, the emphasis that some grantees placed on WEX as the main service activity stems from several factors, including:

- *The absence of economic development and employment opportunities in local areas.* Most grantees emphasizing WEX services as the dominant mode of service delivery are operated by tribal governments located on and off reservations. The weakness of the local economy and the lack of private sector employment in many Indian communities constrained the grantees' ability to provide alternative service options.
- *Participants' expressed need for immediate income gained from working.* Most participants seeking JTPA services in Section 401 programs prefer immediate employment to occupational and basic education training. To address the economic needs of participants, grantees provided subsidized employment services accordingly.
- *Limited service providers for classroom training.* Grantees operating in remote areas faced challenges in providing classroom training as a service option because of the lack of classroom training providers in the local areas.
- *Participants' lack of adequate job skills necessary to gain unsubsidized employment.* Most participants lack adequate job skills and a solid work history to find permanent employment on their own. WEX work assignments enable participants to establish a work history and enter the labor force.

The emphasis on subsidized employment programs in some INA programs reveals several challenges endemic to Section 401 grantees, including local economies dependent on government subsidies, unstable market environments in local areas, and the absence of private sector employment opportunities to promote productive enterprises. These conditions foster a continued reliance on the services of WEX and CSE to sustain the economic well being of participants and their communities.

GOALS AND OBJECTIVES FOR WEX AND CSE

The primary goal of WEX and CSE activities is to provide participants with employment opportunities by assigning them to work assignments that closely match their skill levels and career interests. In addition to this goal, grantees identified a broad-range of other goals and objectives for WEX and CSE programs. These include:

- *Providing an exposure to the world of work.* Many grantees, particularly those located on reservations, view WEX and CSE as important to providing participants an exposure to the world of work. Grantees reported that WEX and CSE services are intended to instill a solid work ethic and provide hands-on experience so that participants can better understand the dynamics of the world of work. Grantees that emphasized "learning by doing" saw WEX and CSE experiences as essential first steps towards obtaining permanent employment for their participants.
- *Acquiring occupational skills.* Gaining occupational skills is an important goal identified by grantees offering WEX and CSE programs. Although this goal is not always realized, grantees perceive WEX and CSE programs as a means to upgrade participants' existing work skills and develop new skills for workers with a limited work history.
- *Providing income to participants who are seeking permanent employment or are enrolled in another service activity.* Providing income to participants through WEX and CSE services was the most common goal across study sites, but was especially important to grantees operating in areas with virtually no employment opportunities.
- *Facilitating placement in long-term unsubsidized employment.* Although employers participating in WEX and CSE are not required to hire participants at the completion of services, grantees often encouraged them to do so.
- *Building participants' self-esteem.* Increasing self esteem with subsidized employment opportunities remains an important goal for a number of grantees, especially tribal grantees located on reservations, where participants lack occupational skills and the self-esteem to find work on their own. Grantees emphasized the need to give participants a "taste of success" so that they can better understand their potential in the labor market.
- *Supporting traditional Indian and Native American values.* Some grantees, especially non-tribal grantees, perceive WEX and CSE activities as opportunities to inculcate traditional Native American values. Three grantees in particular encouraged WEX and CSE participants to learn the history of Indian culture as part of their WEX/CSE assignments; and, in at least two sites, participants are required to speak and understand tribal dialect to be eligible for certain WEX/CSE work assignments. Integrating culturally specific activities

into WEX and CSE services was one way to support INA values in the workplace.

Grantees also perceive WEX and CSE programs as benefiting their communities in addition to individual participants. Three community-level goals noted most frequently included:

- *Staffing the JTPA program, tribal enterprises, non-profit organizations, and public agencies.* WEX and CSE activities are often used to defray the costs of staffing a variety of organizations, including various departments operated by the grantee, tribal government, non-profit organizations and a host of public service agencies such as the Bureau of Indian Affairs, Indian Health Services, and state agencies. Grantees implicitly established this goal to benefit participants and worksites.
- *Promoting community and economic development.* An important overall goal identified by grantees is to facilitate community and economic development by coordinating WEX and CSE services with the needs of the local community. To achieve this goal, most sites utilized the tribe or other Indian-friendly organizations as worksites.
- *Establishing relationships with employers.* Because WEX and CSE programs benefit employers and participants, these programs can facilitate the hiring process and encourage employers to hire WEX and CSE participants directly from the program.

Although these general goals were most frequently reported by grantees offering WEX and CSE, specific objectives varied enormously depending on participants' and employers' needs.

DESIGNING AND DELIVERING WEX AND CSE

In designing WEX and CSE activities, case study grantees were influenced by several different factors, including the employment outlook of the local area, the needs of the participants, and the grantees' ability to develop collaborative relationships with employers. Each of these factors influenced the design of WEX and CSE across case study sites and enabled grantees to design these activities in a variety of ways using diverse strategies.

To ensure that participants' diverse experiences and needs were addressed appropriately, grantees designed WEX and CSE activities in several ways, including: (1) providing WEX and CSE services as "stand alone" activities, (2) combining WEX and CSE services with each other, and (3) integrating WEX and CSE services with another service activity or activities. All sampled grantees use all three approaches at different stages of the service planning, depending on the occupational needs of the participants and the employment outlook of the local area. We discuss the different approaches below.

Providing WEX and CSE as "Stand-Alone" Activities

The first approach case study grantees used to deliver WEX and CSE services was to offer them as stand-alone activities that function independently of other service options. Although all sampled grantees offered WEX and CSE services alone, those emphasizing this approach strongly believed that WEX and CSE are the kinds of services for which their participants had the greatest need because of limited training and job opportunities in their local areas.

Although the focus on either WEX or CSE alone did not offer participants the opportunity to explore other types of training options, and, in many cases, had modest occupational training objectives, these services provide participants an income and can increase their work experience and knowledge of the world of work. Most participants enrolling in WEX or CSE as stand-alone activities typically possess low skill levels and are generally long-term unemployed, or had been underemployed and are seeking to increase their job opportunities in different industries.

Case study sites providing WEX and CSE services independent of other service options generally enrolled participants for the maximum allowable hours for WEX and CSE, unless participants found employment prior to the end of the time limit for these services.

Combining WEX and CSE

The second approach to providing WEX and CSE is to pair them together in one service package. This approach is intended to accomplish several objectives, including (1) enhancing participants' employability, (2) extending the duration of paid work-experience to satisfy participants' economic needs, and (3) attracting employers to hire participants at the completion of on-site customized training. Grantees in this category typically offer these services sequentially, starting the service package with WEX activities for 1,000 hours, then proceeding to CSE activities. Work assignments generally remain unchanged regardless of participants' shift in status from WEX to CSE, although sometimes changes are made to accommodate participants' experiences at the worksite or employers who no longer need their services.

Combining WEX and CSE activities sequentially can offer clients the opportunity to enhance their skill sets with one employer for a lengthy period of time. However, data from case files and interviews with participants and program staff reveal that enrolling in lengthy work assignments through a combination of WEX and CSE activities was rarely linked to acquiring new or additional work skills. Participants were typically not offered additional responsibilities with their status change. The exception to this occurred in worksites where supervisors established procedures to enable participants to progress to challenging tasks with the status change from WEX to CSE. For example, one worksite allowed CSE participants to take responsibility for more complex tasks at the tribal court and to "move up" to a law clerk position from a clerical position upon completion of WEX hours.

A number of grantees provided a combination of WEX and CSE services to employers as an incentive to hire participants on a permanent basis. Indeed, some worksite supervisors used WEX and CSE experiences as a means to measure participants' work habits before deciding whether to hire participants at the termination of the work assignment. However, an extension of WEX and CSE activities did not always mean that participants were assured unsubsidized employment, because employers often lacked the capacity to hire additional staff. This scenario was evident in several case study sites where several participants enrolled in WEX and CSE in the hopes that the worksite supervisors would hire them on a permanent basis once they completed their WEX and CSE assignment. Nonetheless, participants reported that they gained extensive work experience from their work assignments.

Integrating WEX and CSE with Other Service Activities

The third approach that sampled grantees used is to combine WEX or CSE with other service activities such as classroom training, training assistance, or on-the-job training, either sequentially or concurrently. The combined service approach allows participants to receive more than one service while earning income in the interim. Integrating multiple services varied considerably across sites depending on participants' service needs or the grantee's capacity to support multiple service options.

When WEX and CSE activities are provided *sequentially* with other service activities, participants typically enroll in work assignments after they completed training assistance or occupational or basic skills training, and while they are awaiting permanent job placement. We observed examples of work assignments that were directly related to participant's career interests and goals, including the following:

> One grantee carefully selects WEX participants to work in its art gallery and screens applicants for a variety of characteristics, including interest in Native American fine art, strong work ethic, and ability to perform several tasks simultaneously. Participants are also expected to show a strong interest in the history and culture of the Indian experience and are required to read materials to enhance their understanding of Native American culture. WEX participants assigned to the art gallery tend to pursue a career related to fine art.

WEX and CSE services are also sometimes provided *concurrently* with another service activity, including classroom-training or training assistance. The advantage to this approach is that it sometimes enables participants to combine hands-on, practical training with theoretical concepts gained in classroom training. Thus, several sites allow participants to enroll in a GED class or an Associate of Arts Degree program in the evenings while working in WEX or CSE assignments during the day. For example, one grantee enrolled participants in evening child development courses while they were working in a child care center as WEX participants during the day. In another case:

> A grantee located on a reservation enrolls participants interested in pursuing a career in the medical service profession in its emergency medical technician (EMT) training. This WEX and combined classroom training program involves extensive classroom training on the principles of medical care and includes a practical, hands-on component that requires participants to observe real-life examples of the responsibilities of an EMT as carried out in an ambulance. Most participants who enrolled in this activity became employed as EMTs at the end of the training.

Another advantage to this approach is that participants can gain vocational or basic skills training, even if unrelated to the work assignment, while earning an income. The combined approach to WEX and CSE also ensured that participants learn specific occupational skills outside of their work assignments.

The main limitation to this approach is the high cost associated with combining multiple service options, which diminishes the funds available to support other service activities. Paying all training wages, in addition to classroom training, is expensive for grantees, and efforts to develop jobs for WEX and CSE participants also consume considerable staff time. As a result, some grantees limited the use of multiple service options to only those participants facing unusual circumstances. For example, a grantee with moderate funding only provides a combination of WEX and CSE services with another service activity to those deemed "hardest to serve."

Challenges to Designing Quality WEX and CSE Activities

Grantees face several challenges as they design WEX and CSE activities relevant to the needs of their participants and their communities. These key challenges include:

- *Sustaining funding sources to operate WEX and CSE services.* A number of grantees limited the use of WEX and CSE activities because of financial constraints, even though participants expressed strong preferences for these activities. Most tribal grantees, however, have been able to leverage non-JTPA funds to continue to offer WEX and CSE opportunities to ensure that participants have opportunities to transition to self-sufficiency.
- *Ensuring that participants acquire new work skills to complement their existing skills through clearly defined training activities.* Many WEX and CSE work assignments offer only modest training objectives, even to those in long-term work assignments. Because these activities are intended to provide valuable work experience *and* increase participants' potential in the labor force, identifying work assignments with clear training goals proved to be a challenge for some grantees.
- *Providing services consistent with participants' career goals and skill levels.* A number of grantees assign WEX and CSE participants to worksites when positions become open and in some cases, neglected participants' professed occupational interests. A number of participants reported that they were placed in WEX and CSE assignments "wherever there are jobs."
- *Developing collaborative relationships with a wide range of employers.* Some grantees faced difficulty in developing relationships with employers who could offer WEX and CSE training, especially those outside of tribal agencies, and thus often relied on the same few employers to support WEX and CSE programs.

WORKSITES FOR WEX AND CSE PROGRAMS

The mode of providing WEX and CSE services differed somewhat among sampled grantees. While the majority of work assignments are provided in-house by the grantee or the tribe, a number of grantees established relationships with public, non-profit agencies to function as worksites for WEX and CSE programs. This section discusses how grantees delivered WEX and CSE services in the local areas, including the challenges in selecting worksites, the types of worksites targeted, and the factors influencing the selection of worksites.

Challenges

In selecting worksites for WEX and CSE services, INA grantees reported several challenges. These include:

- *The limited availability of worksites.* Grantees located in remote areas faced tremendous challenges in identifying employers to participate in WEX and CSE activities. The limited number of service providers in some areas meant that tribal grantees relied on the tribe as the sole worksite for WEX and CSE activities, while non-tribal grantees relied on the same service providers year after year. To address this limitation, grantees established strong working relationships with the few WEX and CSE providers located within their communities.
- *The inaccessibility of worksites.* A repeated challenge faced by grantees located in isolated areas is the participants' inability to access worksites, many of which are located great distances away from the JTPA office. Although the majority of tribal grantees selected worksites within reservations, other tribal grantees selected some worksites outside of the reservation; one grantee assigned WEX and CSE positions in the closest city located 65 miles from the reservation. Another tribal grantee with multiple field offices placed WEX and CSE participants in the closest metropolitan area, while yet another grantee broadened its selection of worksites to include employers in the closest major city.
- *The limited ability of worksites to hire participants at the completion of the work assignment.* While a fair number of grantees indicated that a number of employers were willing to offer WEX and CSE services, grantees noted that it was difficult to identify worksites that had the capacity to hire participants at the completion of services.

Given these challenges, grantees adopted a number of strategies for selecting worksites. We discuss these strategies below.

Strategies for Selecting Worksites

The procedures for identifying and selecting worksites varied considerably across sites. Selecting appropriate worksites for WEX and CSE services is critical to ensuring high quality, responsive services, according to our model of high-quality training presented in Chapter I. Grantees relied on a broad-range of worksites to provide WEX and CSE services, including tribally controlled organizations, the JTPA grantee itself, community-based organizations, community colleges, churches, non-profit organizations, and public agencies. To address the common challenges presented above, grantees adopted several strategies in selecting worksites, including:

- Selecting worksites from the local areas, including tribal enterprises.

- Providing WEX and CSE services in-house
- Establish a competitive worksite selection process that requires worksites to submit proposals to train WEX and CSE participants.

Selecting Local Worksites, including Tribal Agencies and Enterprises. All tribal grantees in our sample arranged placements in local worksites, primarily with tribally controlled agencies and enterprises, including different departments within tribal government, such as tribal court, health services, and information systems.

Several reasons account for why grantees rely heavily on tribal organizations to serve as worksites. Grantees reported that selecting tribal agencies benefits participants by: (1) providing them opportunities to participate in "comfortable" work experiences with other Indians and gain mentorship opportunities with experienced Indian workers, (2) enabling participants to get "a foot in the door" to permanent employment with the tribe, where positions are generally scarce and competitive, and (3) making work assignments convenient for participants by placing participants in worksites close to their homes on the reservation or in the local communities.

In addition to benefiting participants, grantees reported that using tribal agencies as worksites provides substantial benefits to the local communities by alleviating staffing and training costs of tribal agencies. For example, participants often work at Indian Health Services in a wide variety of positions, including as: a clerk in medical records or patient intake services, a medical assistant, an emergency medical technician, and a certified nurse's aide. Similarly, a number of WEX participants also staff a tribally-run day care center. Grantees reported that staffing these community institutions with WEX and CSE participants is not only vital to the sustainability of these organizations but also supports overall self-sufficiency for individuals and their families by reducing staffing and training costs.

Although there are clear community benefits to using tribal agencies as worksites, decisions about using which tribal agency was sometimes influenced by tribal politics. For example, one tribal grantee believes that certain departments within tribal government are "due" a number of WEX and CSE participants, because of personal relationships between JTPA staff and staff from tribal agencies. Moreover, some WEX and CSE designs appeared to be oriented primarily to further the objectives and meet the needs of tribal institutions, and only secondarily to meeting the training needs of participants. For example, respondents reported that they assigned WEX and CSE participants to tribal organizations primarily because they wanted to help the tribe in its staffing needs. In fact, several grantee staff members acknowledged that a number of WEX and CSE assignments could have taken place as direct hires, without WEX and CSE subsidies, but the grantee wanted to "meet the needs of employers." Although this strategy was not practiced among all tribal case study grantees, there was evidence to suggest that tribal politics and the needs of the tribe greatly influenced the kinds of worksites selected.

Finally, in addition to using tribal agencies, a number of tribal grantees also sought other local worksites that were unaffiliated with the tribe. This was necessary because of the limited positions in tribal agencies. For instance, one tribal grantee established a strong working relationship with local city personnel offices so that participants interested in working for the city government could access these jobs through WEX and CSE.

Providing WEX and CSE in-House at JTPA Offices. To address the challenge of limited worksites in some local areas, a number of grantees provide WEX and CSE activities in-house at various capacities ranging from clerical support to custodial positions. The quality of these work assignments was decidedly mixed. In some cases, grantees assigned participants to positions within the JTPA office that provided valuable training in modern office procedures, such as filing, accounting, and answering phones. In other cases, the positions offered minimal opportunities for participants to gain or practice job skills, but they nonetheless were provided needed temporary income while undergoing job search. These positions also enabled the grantee to carry out its necessary office procedures at minimal expense.

Establishing a Competitive Worksite Selection Process. We found that in some case study sites grantees were very careful in selecting and recruiting worksites, and JTPA staff even assessed employers' ability to provide adequate training needed by participants. Four grantees established a competitive employer selection process and evaluated the employers' track record in hiring participants upon completion of WEX and CSE services. These grantees carefully screened worksites and requested them to submit a proposal for WEX and CSE work assignments for JTPA staff to review. This procedure was designed to ensure that participants were placed in high-quality positions and, ideally, attained permanent positions upon completion of the work assignment.

Factors Influencing the Selection of Worksites

A myriad of factors are important in shaping the decisions in selecting worksites, including: (1) the worksites' Indian status, (2) the worksites' pre-existing relationship with the grantee, (3) the providers' demonstrated ability to offer meaningful training for participants, and (4) participants' interest in working for specific organizations. Below we draw attention to the ways in which these factors influence the worksite selection process.

Indian status. Using Indian organizations as worksites for WEX and CSE programs was a deliberate decision for nearly all grantees. Respondents preferred using Indian providers because of participants' desire to work "with their own people" who can understand their backgrounds. A number of grantees, both tribal and non-tribal, indicated that it was highly important that providers be sensitive to the needs of Indians. One grantee selected a service provider based on its efforts to provide "cultural sensitivity training" to its staff. One participant remarked at the importance of working with other Indians: "It felt good to talk to my own people." Another participant felt a "sense of community and pride" in working for an Indian establishment.

Pre-existing relationship with employers. A number of grantees developed strong linkages with a number of departments within tribal governments or other non-profit organizations, and in some cases paid particular attention to whether the worksite could serve as the permanent employer for WEX and CSE participants. Grantees generally selected worksites that had worked with the INA program before and had already established a rapport with the JTPA staff. This arrangement facilitated future work assignments at the worksite. For example, one grantee located in a metropolitan area had developed a strong working relationship with an employment agency and frequently collaborates with its staff to help identify and select employers for WEX positions.

Ability to provide occupational training. For some grantees, the provision of specific occupational training in WEX and CSE assignments was a significant criterion for selecting worksites. While this criterion was not commonly established in our case study sites, some grantees specifically selected worksites that can provide occupational training. For example, one grantee prefers to assign its WEX and CSE participants in a hospital to ensure that participants can be trained in specific occupations on the job, such as medical assistance and medical file clerks. In addition, two grantees required worksite supervisors to propose how WEX and CSE assignments can achieve specific outcome goals, including a commitment to hire participants upon termination of service and the provision of specific training before participants are assigned. Although providing specific occupational skills training was identified as important by some grantees, we discovered that a majority of WEX and CSE positions provided limited training if at all. This is not surprising since a number of grantees view WEX and CSE activities as short-term work assignments that offer opportunities for participants to gain real work experience.

Participants' interests. A number of respondents indicated that worksites were selected on the basis of participants' interests in working at specific organizations, especially in tribally controlled organizations or Indian-affiliated agencies. For example, one grantee matched a participant interested in working in a clerical capacity to a position as a receptionist in a tribal consortium, where she learned about office procedures and customer service. Another grantee placed WEX and CSE participants at the Indian Health Service on its reservation in response to their strong desire to work in a medical facility.

However, these requests were not always feasible in tribal situations because openings were limited. In fact, we found that worksites were not always carefully selected to reflect participants' interests or any of the criteria mentioned above, even when the WEX or CSE job assignment was of long duration. Grantees typically selected worksites based on the availability of the jobs at a particular worksite at the moment. For example, a number of grantees selected worksites when jobs become available, as a means to provide any work experience, regardless of the employment needs and interests of the participants. One grantee placed the majority of WEX and CSE participants in a child care facility, regardless of their career interests and backgrounds. Although a number of participants assigned to this worksite expressed interest in becoming licensed child care providers, others were assigned because of the convenience of assigning participants in a worksite that willingly accepted subsidized employment participants.

PARTICIPANTS RECEIVING WEX AND CSE

The types of participants enrolled in WEX and CSE services are generally a heterogeneous group but they show common characteristics. Many participants, particularly those living on reservations, have been long-term unemployed or underemployed, lack current skills to compete in the labor market, and have multiple barriers to employment.[3] Many participants reported that, without the opportunity offered through WEX and CSE, their prospects for permanent employment would have been even more meager.

In addition to these characteristics, WEX and CSE participants fell into the following general categories:

- *Youth participants.* A number of grantees indicated that youth participants with limited work experience tend to seek WEX and CSE services. The demand for services by youth participants meant that WEX and CSE positions are often entry-level in nature.
- *Individuals transitioning from public assistance to work.* Many grantees characterized WEX and CSE participants as those transitioning from welfare to work. Since the goals of WEX and CSE are intended to introduce participants to the world of work and provide a broad-brush of skills, enrolling welfare participants was a common practice.
- *Individuals seeking employment only.* The majority of grantees offer WEX and CSE services to clients seeking employment rather than occupational skills training. Grantees operating in areas with low economic growth saw a high demand for immediate jobs rather than training.

Client Selection for WEX and CSE

The procedures by which grantees select participants for specific WEX and CSE activities are unique to the work assignments, and generally include some level of employer involvement. Overall, grantees used four main strategies to assign participants to work assignments: (1) formal interviews with worksite supervisors, (2) informal arrangements between JTPA staff and the worksite, (3) personal relations with JTPA staff and/or the worksite, and (4) reverse referrals.

Among grantees using formal procedures, program staff typically refer several participants to employers upon notification of WEX and CSE opportunities. Some worksite supervisors then interview potential WEX and CSE participants and select individuals according their skill and motivation levels. For example, a worksite supervisor in tribal government interviewed several participants for one WEX assignment in its Information Services department, in search of participants with good writing skills and experience with customer service. Another worksite, a local hospital, views WEX and CSE applicants like job applicants and interviews every potential WEX and CSE participant to ensure an appropriate "fit" between the needs of the participants and the employers.

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[3] Barriers to employment included the following: high school dropouts, individuals who are basic skills deficient, individuals receiving public assistance, offenders, and homeless individuals.

On the other hand, some grantees follow informal procedures in assigning WEX and CSE participants and do not require a formal interview with the worksite supervisor, especially for work assignments that require minimal work experience and skills, such as positions related to general labor. In these instances, grantee staff assign participants based on which participants and which WEX or CSE job slots are available at the moment.

In some cases, we discovered that decisions about assigning specific WEX and CSE positions are made on the basis of the participants' personal relationship with the staff at the worksite, and, in at least two case study sites, on the basis of tribal affiliation. These two tribal grantees gave priority to tribal members when assigning WEX and CSE opportunities (but provided opportunities to all Indians seeking other employment and training services).

Several grantees also practice reverse referrals in assigning participants to specific worksites. In these cases, employers selected specific workers they wanted to hire and then referred them to the grantee to determine their eligibility for JTPA. For example, a participant identified a job opening at Indian Health Services as a medical file clerk but the supervisor suggested that she apply to JTPA for WEX or CSE eligibility. This employer indicated that it was unable to hire unsubsidized workers immediately and needed the assistance of WEX and CSE to support its staffing needs. Although reverse referrals are arguably troublesome because many employers would hire participants without the support of WEX and CSE services, grantees generally accepted reverse referrals because of the dearth of employment opportunities in the local areas and the desire to maintain a good working relationship with employers for future placement opportunities.

CONTENT OF WEX/CSE

An assumption of high quality training in our conceptual model, presented in Chapter I, states that work-based services, particularly for WEX and CSE, should have clear training objectives that promote active learning of work-relevant skills, including durable skills, while allowing opportunities for participants to gain evaluative feedback on their progress. While many WEX and CSE work assignments offer participants the opportunity to acquire workplace skills and broaden their work experiences, some work assignments had very modest training objectives. In some cases, this was because they functioned as temporary work assignments while imparting some benefit to the community. We therefore evaluate these shorter-term work assignments based on the coordination of work activities with the needs of the local community.

Types of WEX and CSE Positions

Grantees provide a broad-range of entry-level full-time or part-time work assignments for WEX and CSE. Work assignments fell into the following general categories:

- *Clerical office positions.* A number of participants provide overall administrative support to worksite staff, including filing, answering phones, and data entry. Examples of clerical positions include receptionists and file and accounting clerks.
- *Health workers.* Grantees also assign participants to work in a medical facility at Indian Health Services or local health centers and hospitals. Work assignments varied widely depending on openings and participants' qualifications. Examples of these positions include: medical assistants, nurse's aides, general medical intake workers, clerical support, certified Emergency Medical Technicians, and staff support in an AIDS unit at a community health clinic.
- *General labor.* A number of positions related to general labor are included in the repertoire of WEX and CSE activities, including general maintenance, stock persons, construction workers, and roofers.
- *Social service.* Work assignments in the social service sector are also offered, including providing staff support in a foster care center, a homeless shelter, and at a day care center.

The wage rate paid for WEX and CSE ranges from minimum wage to $6.00 per hour.

Training Content for WEX and CSE Programs

The training content for many of these work assignments varied tremendously. Overall, grantees promote modest training objectives for WEX and CSE programs, in that these programs are oriented to providing work experience and increasing participants' work maturity skills. Typically, worksites adopt an informal, hands-on approach to training, rather than adhering to a formal, pre-established training plan.

Although a formal training component is not emphasized for many WEX and CSE programs, we found some innovative approaches that were used to provide training in a work setting. For example, one grantee develops a contract with the worksite and requires all employers interested in accepting WEX or CSE participants to submit a written request, along with a job description listing the qualifications for the position, work responsibilities for the participant, and responsibilities for the worksite supervisor. The contract also highlights training objectives for WEX and CSE, indicating areas in which participants are expected to gain competency at the termination of the work assignment. Another grantee selects a worksite that provides intensive, formal training in Emergency Medical Technician on site as part of its WEX assignments. The training consists of CPR, first aid, medical emergency procedures, and hands-on training in an ambulance once participants master the fundamental concepts of health science. These examples demonstrate the potential for WEX and CSE programs to offer formal training as part of the work assignments to assure participants gain customized training.

In other cases, despite the absence of formal training plans, participants expressed satisfaction that they were learning important job skills and that their training was self-paced with adequate supervision and consisted primarily of "learning by doing."

Entry-level work assignments may also provide valuable training in work maturity and basic occupational skills for participants with limited skills or little previous work experience, again despite the absence of a formal training plan. For example, a 24 year-old single mother with no work experience and multiple barriers to employment, including former offender status and basic skills deficiencies, was placed in a clerical position at the JTPA office temporarily, where she interacted closely with youth. Although her work assignment did not include specific training on the mechanics of office procedures, she gained an interest in working in an office environment and realized after this experience that she enjoyed working with young people and was hired for $9 per hour as a Johnson O'Malley tutor for youth.

In contrast to these examples, many WEX and CSE positions offered only meager training opportunities. Moreover, sometimes striking training mismatches occurred, as when participants with sufficient work experience were assigned to entry-level work assignments geared towards inexperienced workers. For example, one grantee operating in an economically depressed area assigned a participant with extensive work experience and training in accounting and business as a stock person in a family service center. Although the participant expressed gratitude for the opportunity to work with other Indians, he also realized his skills were not being adequately used. Unfortunately, at the time of the site visit, the grantee was unable to develop WEX opportunities that could effectively meet this participant's employment needs.

INTENSITY AND DURATION OF TRAINING

The length of time participants enroll in work-based activities can be an indicator of the responsiveness of WEX and CSE services. The intensity and duration varied significantly depending on participants' unique circumstances and the grantees' capacity to offer high-quality work-based opportunities. All programs provided WEX and CSE services in three categories of duration: high, moderate, and low duration.

- *High duration/long-term work assignments.* Participants enroll in WEX for 600 to 1,000 hours and CSE for the maximum allowable hours relative to the grantees' budget.[4] Participants generally work in a full-time capacity for 40 hours per week.
- *Moderate duration.* Grantees also provide training at a modest level, ranging from 200 to 600 hours. Participants typically worked part-time or full-time depending on their needs or the needs of the worksite.
- *Low duration/short-term work assignments.* Participants enroll in these programs on a part-time or full-time schedule for less than 200 hours, typically for several days in between service activities or during their job search activities, until they find permanent employment.

In determining the length of WEX and CSE activities, program staff used several criteria, including the needs of the worksite and participants' interests and service needs. Examples of variations in the duration of these services are provided below.

> One grantee provides long WEX assignments of 1,000 hours for some participants and "mini" assignments lasting a few days at a time for others. Long assignments are provided to individuals with multiple barriers to employment, on the grounds that they need the extended work experience to acquire occupational skills. "Mini" assignments are designed for those already enrolled in occupational skills training and unable to find permanent employment. For instance, a WEX participant who has been unable to find a job was enrolled in a WEX assignment for a few days to help prepare the mailings for the grantee's

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[4] The statutory requirements restrict WEX services to 1,000 hours maximum and CSE activities to 10 percent of the annual JTPA budget.

> quarterly newsletter. These brief assignments also provide an opportunity for participants deemed not "job ready" to demonstrate their capabilities.
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> Another grantee provides WEX and CSE services to individuals undergoing job search, and the duration of WEX and CSE is determined by how soon participants can find employment. For example, if a participant has not found a job quickly, s/he will enroll in WEX or CSE and will remain enrolled until finding employment.
>
> Another grantee prolongs the WEX and CSE experiences by supporting the extension of subsidized employment with tribal funds for another 26 weeks at the completion of the first 26 weeks of JTPA-sponsored WEX services. Grantees providing long-term assignments also explicitly used WEX and CSE programs as a placement tool to induce worksite employers to hire participants who have engaged in customized work-based training.

However, sometimes decisions about the duration of WEX and CSE assignments were made without careful consideration of either participants' needs or the trends of the local labor market. For example, a grantee located in a high economic growth area with a low unemployment rate assigned its job-ready participants in WEX and CSE for nearly twelve months. Similarly, many grantees provide WEX services for 26 weeks for nearly all of their participants, regardless of their educational and employment background, believing that this was the most appropriate decision for participants given the poor economic context in which clients live.

Clearly, grantees face ongoing challenges in developing work assignments that can meet the needs of both the participants and reflect the realities of the economic conditions in their local areas.

QUALITY OF TRAINING

WEX and CSE programs make up a significant portion of case study grantees' service options. Providing these services effectively involves a careful assessment and analysis of the needs of participants, employers, and the local community. Ideally, it should also be coordinated with local industries and agencies.

Along these lines, our model of high-quality training presented in Chapter I spells out several criteria for effective work-based services. These criteria are especially pertinent for WEX and CSE positions of longer duration, rather than those viewed as stop-gap assignments (e.g., for those undergoing job search and who are expected to secure unsubsidized employment relatively quickly). These features include:

- *Clear training objectives.* Work-based activities should have clear training objectives so that participants can acquire new, durable, and transferable skills.
- *Good match between participants' needs and work assignments.* Work assignments should parallel participants' training needs, interests, and skill levels.
- *Effective supervision and monitoring of participants' progress.* Supervision of worksite activities should allow opportunities for participants to gain evaluative feedback and promote active learning and to ensure effective supervision and mentoring.
- *Coordination of work-based activities with community initiatives and programs.* When work-based services are used to improve occupational skills, grantees should demonstrate a strong coordination of work activities with other initiatives in the local community.

In implementing WEX and CSE according to these guidelines, grantees faced challenges due to internal and external constraints, including limited funding and limited employers to provide WEX and CSE opportunities.

Developing Clear Training Objectives

To be most effective as a training vehicle, WEX and CSE services should have clear training objectives that can present opportunities to gain new skills. On the whole, many grantees emphasized that WEX and CSE activities should address work maturity skills and, sometimes as a result, specific training objectives were poorly specified. One grantee, for example, emphasized the importance of "getting participants over the fear of what it means to work." Similarly, a number of grantees identified generic training objectives for WEX and CSE programs, such as using WEX and CSE "to enhance the employability of individuals through the development of good work habits and basic work skills."

Overall, we found only modest training objectives for WEX and CSE services. In fact, training objectives were not clearly developed in most case study sites. However, several grantees were the exception and demonstrated a concern towards obtaining specific training goals through WEX and CSE. An example of a grantee establishing specified training objectives is presented below:

> One grantee established a clear training policy and developed a training contract similar to an OJT contract for all of its WEX and CSE assignments. The grantee and the worksite supervisor at the children's shelter jointly develop a training plan that outlines specific competencies to be gained at the completion of the work

> assignment. Several objectives were identified, including (1) attaining clerical skills in record keeping, filing, and answering phones; (2) participating in project outreach by corresponding with youth clients and their families; and (3) serving as a co-trainer to peers involved in peer counseling. The contract also outlines responsibilities for the worksite supervisor and the participant.

In some cases, the presence of training goals was due to the efforts of the worksite rather than the policies established by the grantee. For example, a worksite supervisor in the tribal enrollment department developed several learning goals for the work assignment, including: understanding the computer systems used by tribal offices; understanding tribal enrollment procedures such as indexing, filing, and searching the database; gaining proficiency in clerical skills; and understanding how different tribal offices interface with one another.

Matching Participants to Work Assignments

Grantees faced challenges in their efforts to match participants to appropriate work assignments. As previously mentioned, grantees were often constrained by several factors in matching participants to work assignments, including: (1) limited work assignments in their local areas, (2) participants' need for immediate income, (3) transportation challenges in remote areas, and (4) the needs of the tribe, which sometimes determined the kinds of work assignments available to participants.

Partly because of these constraints, we observed that many work assignments under WEX and CSE, even those of long duration, were not related to participants' career paths. Nonetheless, we identified several exceptions earlier in this chapter that demonstrated that some grantees pay very careful attention to the matching process.

Supervising WEX and CSE Participants

Our model of high quality training suggests that supervising participants should occur in the form of mentoring and coaching rather than "teaching," and provide opportunities to learn through evaluative feedback on participants' progress at the work place. We found that worksite supervisors played a large role in monitoring participants' progress and grantee staff exhibited varying levels of effort to document participants' learning gains.

We observed that worksite supervisors held high expectations of WEX and CSE participants and treated WEX and CSE participants "like other employees," and expected them to work "just as hard" as non-WEX and CSE staff persons. Below we highlight examples of innovative strategies grantees and worksite supervisors implemented to supervise and mentor WEX and CSE participants.

> One worksite requires WEX and CSE participants to get written evaluative feedback on a monthly basis for the first two months, followed by an evaluation after every three months. The performance evaluation lists statements (e.g. "Employee is consistently punctual") and rates participants' performance on a four-point scale: excellent, good, fair, and poor.
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> In another case study site, all participants receive feedback on their performance on a weekly basis or depending on the schedules of the worksite supervisors. Although the grantee enrolls WEX and CSE participants at this worksite on a regular basis, the grantee only enrolls one participant in one department at a time, allowing opportunities for participants to receive individualized attention from the worksite supervisor.
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> Training at one case study site was highly interactive. Instructors and day care staff serve as "mentors" and provide individualized instruction to participants. Staff and participants "work side by side" at the day care center, and staff provide supervision when necessary. Staff at the day care center model ways to handle infants and ways to guide activities with pre-schoolers and afterschool children. Participants later simulate the same activities. Participants are continually observed on how they adapt to their assigned tasks and are given feedback of their performance.

Some participants indicated that they were allowed a high-level of autonomy in their work tasks while others were closely supervised. Supervisors reported that in general, they found participants to be hard working, skillful, and reliable.

Some grantee staff also facilitated mentoring and coaching by documenting participants' progress and ensuring that supervision was occurring at the worksite. Typically, grantees scheduled monthly meetings with worksite supervisors to discuss concerns about participants' performance and other issues that may have arisen during the course of the training. A number of grantees also telephoned the worksite once a week to discuss how participants adapt to their roles. We also found evidence to suggest that a number of grantee staff played a limited role in mentoring participants during their training in WEX and CSE because of high case loads and limited human resource capacity.

Individualized Attention

Another important dimension to learning is the amount of individualized attention participants receive at their worksite. Nearly all case study sites provided individualized attention to participants, and the ratio between supervisor to participant is low, typically ranging from 1:1 or 1:5.

Worksites promoted several approaches to facilitate individualized instruction. Typically, worksites assign a permanent staff member, (e.g. a secretary, or a department supervisor) to provide individualized training at the worksite. Grantees also refer one participant to worksites at a time to ensure that the experience provides opportunities to learn on an individual basis. Each of these approaches enabled supervisors to fine-tune the instruction to match the participants' learning pace. In one worksite, a supervisor assigns "easy" tasks first before progressing to more complex tasks, and closely observes the participant to measure the participant's proficiency before assigning new tasks.

Coordination of Work Activities

An important objective of WEX and CSE services is to contribute to the overall economic and community development of Indian communities. A number of grantees coordinate WEX and CSE services with other community initiatives to expand the resources available to participants and their families. A number of grantees leverage existing resources such as tribal funds and other state funds to continue to support WEX and CSE participants. For example, several tribal grantees arranged for the tribe to increase the wage rate of WEX and CSE above the minimum wage and extend the work assignments so participants can further gain training at the worksite.

CONCLUSION

This chapter provided an in-depth analysis of WEX and CSE services in 23 case study sites. We found that these service activities can meet very diverse needs and serve many objectives, including, from the participants' standpoint: teaching occupational skills training, providing those with limited work histories an exposure to the work world, boosting self-esteem and self-confidence, teaching pre-employment and work maturity skills, providing immediate income, and offering an entrée to permanent employment in positions with the tribe for which the competition is fierce. From the standpoint of the community, the subsidized labor associated with WEX and CSE help tribal and other public agencies provide community services that would otherwise be prohibitively costly.

It is surely a challenge for grantees to design positions that balance these diverse and often competing objectives. One way they do so is by varying the duration of the

WEX and CSE assignments. Thus, positions sometimes last just a few days, as when they serve primarily as stop-gap measures to provide immediate income for participants who are undergoing job search. In these cases, training objectives are typically modest and are rarely well-specified, as seems appropriate given the nature of the assignment. At the other extreme, WEX placements last up to the 1,000-hour allowable limit, and CSE is used to prolong the assignment still further. These examples pose more difficult dilemmas for grantees, as they must meet the employing agencies need for labor in specified jobs, meet the participants' short-term need for immediate income and work experience, and meet their longer-term need for skill training that will promote long-term employability. Grantees balance these multiple objectives with mixed success.

IX. TRAINING ASSISTANCE AND PLACEMENT AND POST-TERMINATION SERVICES

This chapter describes the services associated with the Training Assistance, placement, and post-placement components of the JTPA INA program among the 23 grantees participating in our study. The services are crucial to the programs and to program participants because they largely determine the degree to which prior program investments enable individuals to transition into careers leading to self-sufficiency. Moreover, these services reach the largest number of participants, compared to other service activities, and thus have the potential to make an enormous impact on the economic and social health of the communities served by INA programs.

This chapter will discuss findings resulting from visits to our 23 sampled grantees and in-depth observations of training assistance (TA) services in four sites. First, we provide an overview of the TA service component. Next, we discuss the objectives of grantees in providing TA services to their participants. Finally, we address the design and delivery of these services, pointing to specific challenges the grantees encountered and innovations they developed.

OVERVIEW

Federal legislation guiding the implementation of JTPA INA programs identifies a variety of services that may be provided under the Training Assistance component. These include:

- *Orientation to the World of Work*—including training designed to prepare participants for the demands of full- or part-time employment.
- *Counseling*—including employment-related testing and job counseling.
- *Case management*—including monitoring the clients' progress through training or other services and serving as a facilitator.
- *Job development*—including marketing placement services to employers.
- *Job search assistance*—including job search skills instruction, individual job search or career planning, and other specialized services leading to unsubsidized employment on the part of participants.
- *Job referral and placement*—including matching individual participants to jobs for which they are qualified.

- *Vocational exploration*—including providing special activities designed to assist participants in making informed career choices.

The objective of these services is to assist participants in moving into unsubsidized employment situations by linking them to quality jobs or information about jobs for which they may be qualified. Most grantees have also realized the importance of providing participants with job-search training under this service activity.

All grantees in our sample provided TA and related services to their participants. We were therefore able to conduct interviews about TA services with program staff and participants at all sampled sites. At four of these sites, we were able to observe service activities in progress, and conduct interviews with participants, program staff, case managers, and, in cases where TA services were provided by contractors, the service providers as well. We also reviewed the case files of participants who had received TA as a part of the total service packages, and those of participants who had received solely TA services.

Although all sampled grantees provided TA services, the emphasis they placed on it relative to other services, and the depth and breadth of those services, varied enormously. In some cases, strategic decisions resulted in TA services as an area of emphasis; in others cases, an emphasis on other service activities resulted instead.

For example, we used the percentage of program participants receiving *only* TA (available from the Annual Status Reports) as an indicator of the level of importance placed upon direct placement services, which represents an important component of TA.[1] These percentages among our sampled grantees ranged from 1.2% to 95.6%. The following table illustrates this variation.

Pct of participants receiving only TA services	**Number of Sampled Grantees**
0%-25%	11
25.1%-50%	5
50.1%-91.5%	5
	21 total grantees[2]

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[1] This reporting item represents those participants who, during the program year, received Training Assistance *and no other* training or subsidized employment, at the time the ASR was submitted.

[2] Two sampled grantees did not report figures for this variable.

OBJECTIVES OF TA AND RELATED SERVICES

Grantees providing TA services in urban, higher growth areas faced somewhat different challenges than those serving participants in reservation areas where jobs were scarce. For example, in urban areas, job opportunities were often much more plentiful, but grantees need to attend to some participants' lack of preparation for urban life and their sometimes unrealistic work- or income-related expectations, along with the absence of family or community networks offering them support. These grantees also needed to overcome the bias of employers who were less willing to "take a chance" on Native American participants. Urban programs designed their services with these challenges in mind.

By contrast, in reservation areas, job opportunities—especially private sector jobs—were typically hard to come by or quite limited in the range of occupations or work settings that were available. Moreover, many tribal programs were providing services in areas with low population density, making it difficult to achieve economies of scale in providing *any* services associated with the JTPA program, TA services included. As a result, the service designs and delivery mechanisms associated with these programs were quite different from those of their urban counterparts.

Despite these important differences, most grantees perceived TA services as important and identified several common objectives of the TA components of their programs including: (1) providing general guidance and counseling, (2) assisting participants in identifying career interests and exploring potential career options, (3) assisting participants in developing plans to achieve their career goals, (4) assisting participants in transitioning from another service activity into unsubsidized employment, (5) assisting participants in securing unsubsidized employment, and (6) building the capacity of individuals to achieve self-sufficiency and promote healthy and prosperous Indian communities. Each of these is addressed below.

- *Providing guidance, support, and counseling to program participants as needed.* Many grantees provide counseling to participants not just to support career guidance but on a whole range of personal, family, and community issues, as a part of the comprehensive service approach common to these grantees. Given the enormous health and socioeconomic challenges confronting the service population, this service is crucial in helping participants prepare for participation in other service activities as well as for employment.
- *Assisting participants in identifying career interests and employment options.* Grantees enroll many participants who have never held jobs or

who have not been exposed to the world of work on a regular basis. As a result, helping participants explore their own interests before enrolling them in a specific training or work experience program is often an important component of training assistance.

- *Assisting participants in establishing career (and personal) goals and developing plans to achieve them.* Because career planning for a Native American clientele often involves difficult family decisions (such as whether to relocate where there are more opportunities or compromise career interests to remain near family and community), grantees' ability to help participants establish realistic and consistent career and personal goals is crucial in achieving high-quality participant, community, and program outcomes.
- *Assisting participants in transitioning from another service activity into unsubsidized employment.* Grantee staff often use training assistance to facilitate the transition from subsidized employment or classroom training into unsubsidized jobs. This can be accomplished through job development activities or by providing instruction and assistance to participants in individual job search strategies.
- *Assisting participants in securing unsubsidized employment.* Grantees also use training assistance to facilitate participants' direct entry into unsubsidized employment, either through job search training, job leads, or other supports (e.g., supportive services).
- *Building the capacity of individuals to achieve self-sufficiency and promote healthy communities.* For many grantees, providing training in job search and in navigating public and private agencies and programs for additional supports, or for jobs, was an important part of training assistance activities. These services enabled participants to engage in job search not only immediately, but over time as their career interests and needs changed. Several grantees also noted that many participants who had achieved self-sufficiency served as valuable family and community role models. Additionally, particularly in urban areas, grantees place great emphasis on *creating* community (rather than working within it, as in reservation areas), as part of the TA activities. Participants indicated that this is a key service provided by INA grantees in urban areas.

DESIGNING AND DELIVERING SERVICES

Important aspects of the design and delivery of TA services in the programs we studied included promoting access to services and ensuring that services were delivered in a way that was sensitive to participants' and communities' cultural values.

Promoting Access to Services

INA grantees spend a great deal of face-to-face and one-on-one (over the telephone or in-person) time with their customers. Common one-on-one activities included job-search assistance, career counseling, and "problem-solving." As noted earlier, a particular challenge INA programs face is the frequency and intensity of significant needs *in addition to work* among their customers. As a result, staff typically stretch "career counseling" into general counseling on a wide range of issues, including mental and physical health, parenting, child-care, and transportation.

One challenge faced by grantees, however, was that of promoting access to these counseling services. As was discussed in Chapter V, customers with good personal or familial networks or those residing closest to service delivery points had an easier time accessing services than individuals who did not meet these criteria. However, far-away customers were no less in need of services, prompting grantees to identify multiple ways to reach participants, in the face of dispersed service areas and, in many cases, limited transportation networks. Because training assistance was such a commonly provided service activity, strategies to promote access were particularly important to ensure that customers got the career guidance and other placement assistance they needed. Among the strategies grantees used were: (1) combining and sequencing training-assistance services for the convenience of customers, (2) contracting services rather than providing them in-house, using outstations, or establishing joint referral networks, (3) subsidizing or actively taking responsibility for customers' transportation needs, and, to a lesser degree, (4) promoting self-access services.

Combining and Sequencing Services. Grantees facing transportation (and related) challenges tended to combine and sequence training assistance in a variety of ways. For example, some grantees employed creative scheduling to concentrate services in as few visits as possible, so that participants were not forced to visit the service site as frequently as they might have otherwise. Thus, several grantees arranged for customers to meet with their counselors right after their orientation program or right before an interview. This way, customers could access multiple services during the same pre-scheduled visit. Similarly, programs might introduce career exploration as an activity, and then encourage participants to engage in it immediately. In this way, customers could generate the highest added value for each trip they made to the service site.

Contracting Services, Outstationing Staff, or Forging Joint Referrals. Another way grantee staff attempted to make services easy for participants to access was to contract services to private or public providers. This strategy helped make services more accessible to customers. For example, grantees may not have provided a "World of Work" seminar in-house, but they required it of their contractors for CRT, whether basic or vocational education. This way, providers of CRT might devote several class periods to work/life-skills as a part of the overall training program.

As discussed in Chapter V, many grantees also established satellite offices. However, several indicated that budget cuts over the years had forced them to reduce the number of satellite facilities they operated. For example, one grantee had closed two "satellite" offices as a result of such budget reductions. As an alternative, some grantees regularly rotated service sites by outstationing staff at strategic locations in the communities they served. Thus, customers may meet their career counselor/case manager for the first time in the main service site (e.g. JTPA program headquarters), and then meet them in a site closer to their home on subsequent occasions. Associated with this strategy, some grantees assigned case managers to customers based on geographic proximity, so that it was possible for staff to provide services from remote locations that were near multiple customers and near staffpersons' places of residence.

As an alternative strategy, staff might spend several days per week in their "home" office, and the rest of their time providing services out of the offices of partner agencies. For example, one grantee provided services out of a community college several days per week, while another provided services through a state agency office.

Some grantees also established joint referral networks or cooperative agreements with other social service agencies. For the most part, however, the establishment of partnerships with other agencies that would enhance the ability of grantees to extend their service reach was an underutilized strategy, particularly for urban sites. For example, while many grantees had developed high-quality partnerships with local employers or other local service providers, few had more than cursory relationships with traditional providers of workforce development services, including those leading the federal and state One-Stop initiatives. Although some grantees expressed reluctance about establishing partnerships with non-Indian providers or providers outside their immediate areas, linkages to organizations and agencies involved in One-Stop have tremendous potential to connect grantees to resources, training opportunities, and technology at minimal cost to the grantees. Other grantees had the impression that

One- Stop was an "urban" initiative. However, one of the capacities that One-Stop has helped promote is long-distance learning, a service that could greatly benefit customers of tribal JTPA programs (and in many cases, is already benefiting customers connected to community colleges and other public and private training providers). Moreover, the one grantee that had developed high-quality partnerships with the state and local organizations and agencies involved in One-Stop was a rural grantee.

Still other grantees either did not know about the One-Stop initiative or did not wish to participate in the partnerships developing to support it. In some cases, however, this was clearly a missed opportunity. One grantee, for example, was attempting to provide comprehensive services (on a shrinking budget) in an urban area with a plethora of good job opportunities. Grantee staff were engaged in labor-intensive one-on-one job matching activities among small employers that were generally not connected to the One-Stop systems in their areas and that paid low wages. In essence, the grantee was inadvertently competing with providers with more resources and better service networks and, as a result, undermining its capacity to provide the *specialized* supportive services its participants needed most. In other words staff were attempting to duplicate a comprehensive service system rather than emphasizing the unique supports that they could provide better than their competitors.

In contrast, another grantee has witnessed numerous benefits as a result of its participation in the state's One-Stop initiative. This site was engaged in region-wide strategic planning around economic and workforce development—largely as a result of the partnerships formed through One-Stop. Partners held monthly planning meetings, alternating sites. One of these meetings took place during our site visit. Local partners representing the three surrounding cities met at a tribal center to plan school-to-career events on a regional basis.

We hasten to add that One-Stops should not be viewed as substitutable for the services that are provided by specifically Native American grantees to their clients—as we have indicated in a number of places throughout this report, INA grantees serve a unique and irreplaceable role in meeting the needs of Indian people and communities. However, the partnerships forming in response to the federal and state One-Stop initiatives and the support for collaboration provide valuable opportunities for urban and rural grantees alike to gain access to additional resources. These are opportunities that should not be missed.

Linking Customers to Transportation Resources. Many grantees made access to transportation or information about transportation a key part of their overall menu of services. This occurred in several ways. In some cases, grantees directly reimbursed customers for mileage or played an active role in promoting ride-share programs—programs that link individuals with common transportation patterns to one another. However, this was not an option for many customers who did not have access to private transportation at all.

In such cases, program staff provided tokens or passes on public or available private transportation (e.g. employer-sponsored shuttles) and advocated on behalf of their customers for increased access to public transportation. Again, however, these services did not meet the needs of individuals who did not live near public transportation lines or were not yet employed or otherwise connected to a potential shuttle service.

In some cases, grantees themselves sponsored a shuttle that would take individuals to common points of interest, such as schools, large employers, public transit routes, or to the grantees' place of service. Although the shuttles offered transportation alternatives to customers with no access, they served not just the JTPA programs, but multiple programs sponsored by the grantee. As a result, they were not wholly reliable, making it difficult for customers to arrive at their destinations in a predictable manner.

None of these options "solved" the transportation challenge, but they all served as support that JTPA INA participants could access.

Self-Access Services. Although self-access services stand out as a key means of extending access to participants and eligible customers for whom traditional service delivery methods may not be adequate, grantees tended not to emphasize self-access services in their programs.[3] There were a variety of reasons offered for this including: (1) the potential for participants to be intimidated by self-access services; (2) the lack of available technology; and (3) disinterest on the part of staff or participants (and, conversely, the high emphasis placed on personalized face-to-face services).

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[3] Few programs, whether rural or urban provided self-access services.

While each of these explanations has its validity, self-access services may be underestimated as a tool from which INA grantees may benefit, especially in providing training assistance services. For Indian employment and training programs, the number and variety of workforce-related resources available through the Internet is mind-boggling. Moreover, as a result of enormous investments by U.S. government agencies, such as the Department of Labor (including DINAP) and the Department of Education, many of these resources are in the public domain and can be accessed without a fee. These resources include tools to educate customers about the types of careers available and what is required to pursue them, tools to assist customers in skill-building, tools to assist customers in accessing information about jobs, and tools to assist customers in accessing the information they need to make informed job/career decisions.

Perhaps even more important is the on-line information (and resources) available to assist *staff* in linking their customers to information and services that meet their needs—high-quality and locally-relevant labor market information, for example, is difficult to access without technology. Moreover, the communication that electronic connectivity makes possible may enable staff to better advocate on behalf of their customers with other programs, service providers, or decision-making bodies (government or tribal representatives).

Moreover, for rural sites in particular, electronic information about careers that are not available locally may be the *only* information customers can use to make their career choices. Thus, in this context technology has a role to play in connecting participants to opportunities that may exist for jobs elsewhere (where there are no alternatives or the customers choose to leave their areas for a time), home-based enterprises, temporary (off-reservation) work or apprenticeships, short-term non-local educational opportunities, or small-business assistance. Additionally, and perhaps more importantly, technology can give Indian (or non-Indian) employers a way to find qualified trainees, employees, or apprentices enrolled in JTPA programs—locally or long-distance.

Both INA grantees offering self-access services, and other programs serving special needs customers, can lend insight into the challenge of making appropriate and value-added self-access services available to customers of INA programs. For example, although some customers may indeed be intimidated by self-access services, the experience of some programs is that the learning curve among customers is often very quick and very steep. One rural grantee had begun to use long-distance learning in its vocational and community college programs with great success, and was exploring the possibility of providing other work-related training to long-distance learners using this technology. Another grantee had developed a resource room consistent with the state's standards of self-access services and found that participants took to it quite well.

These efforts, most of which were new and not yet fully operational, nonetheless witnessed success in achieving their planned objectives and led to additional positive unintended outcomes as well. One program reported that, as customers became more familiar with technology, they could better assist their children with homework. Another reported that with technology training, their customers had begun to demonstrate more confidence in their interactions with all agencies, service providers, and commercial exchanges because they had a greater sense of control over their situations.[4]

While self-access services cannot and should not replace face-to-face contact, they can help programs provide better services to more customers. In particular, technology can assist in the provision of a variety of training assistance services—orientation, counseling, job-development, job-search, placement, and vocational exploration—and can enable skill-building at the same time. At the same time, it must be acknowledged that the effective use of technology requires a substantial up-front effort that will be difficult for many grantees to make.

Delivering Culturally-relevant Services

Because training assistance activities are among the most widely accessed, they represent a particularly important vehicle for delivering services that meet the special needs of the Native American job-seeking populations. Along these lines, we met with staff that indicated that their organizations should be serving as "practice grounds" for individuals preparing to enter the workforce or enroll in training programs. This might mean enforcing "appropriate" workplace norms and behaviors with consequences for non-compliance. Alternatively, it might mean creating a safe environment in which participants are free to make mistakes without fear of reprisal so that they could serve as learning opportunities for all. Or it might mean simply providing a work environment and work experience for individuals preparing for subsequent jobs or jobs in non-Indian environments.

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[4] A specific instance noted was increased comfort in using debit card transactions at the grocery store.

Most grantees, however, did identify at least five interrelated features of their programs that either made them different from non-Indian employment and training programs or made their programs stand out as crucial services in the Indian communities they served. These included: (1) placing the family (and extended families and communities) at the center of services rather than the individual participant; (2) identifying appropriate employment opportunities that meet the unique needs of participants; (3) connecting Native American job seekers with Native American employers; (4) ensuring that non-Indian employers have access to skilled Native American workers (e.g., on reservations, by connecting the TERO to the employment and training systems); (5) serving as a bridge, whether through information or work experience, between Indian participants and work and learning opportunities in the non-Indian economy; and (6) providing some level of personalized post-placement supports to increase job-retention and advancement.

Placing Family and Community at the Center of Services. Increasing numbers of providers of employment and training services are discovering that an individual's employment needs cannot be met independently of other basic needs, such as mental and physical health, self-esteem issues, and the more tangible barriers of transportation and child-care. They call this addressing the needs of "the whole person." Providers of JTPA INA services have a long history of adopting this approach and typically take it even one step further by helping participants care for the "whole family." In practice, this means that providers attempt to help participants address employment barriers that lie far outside of JTPA boundaries by connecting them to a wide range of other services and supports provided by the tribe or in the community. For example, if a participant is caring for an elder relative, and therefore not able to work, a JTPA case manager may bring in elder care services, or help the participant find alternative ways to meet that need, prior to providing job-related services to the JTPA participant. Alternatively, when family situations change as a result of a working parent, case managers may play a role in helping the family identify new activity patterns that support the family in its new situation.

Meeting families' comprehensive needs can potentially have a critical impact on the effectiveness of employment and training services. To their great credit, all of the programs we visited to some degree had integrated an element of "family care" into their menu of services. This constituted one of their key strengths.

Identifying Appropriate Work Opportunities. Another role that the JTPA staff can and do play is identifying work opportunities that meet the unique needs of the participants. This role was a difficult one for grantee staff to navigate. On the one hand, grantee staff seek to assist their customers in identifying employment opportunities in which they are likely to be successful. As a result, the programs tend to provide a great deal of support in the way of identifying appropriate job leads. However, part of the objective in providing job search assistance is to help participants develop job search skills, thereby empowering the participants to seek and find their own jobs in the future. This kind of assistance/instruction was less common than wholly assisted job search. In other words, grantee staff were more likely to provide more placement assistance than job search assistance, leaving the participant dependent upon assisted services again the next time a job search was necessary.

Several pitfalls emerged as a result of emphasizing placement assistance over job search skill-building activities. First, as case managers identified opportunities that they felt would be appropriate for their participants, they risked playing more of an advocacy role for their participants than providing placement or matching services for their employer customers. As a result, some programs were perceived by employers as "difficult to work with" or as referring job seekers who were ill-prepared.

Second, when programs did not promote job-search skills acquisition, they often found themselves serving many repeat customers. For example, because staff often (out of necessity) referred customers to seasonal jobs rather than permanent ones, customers needed services again within a short time frame. In their turn, because these customers had used JTPA services already and were familiar with them, they returned as they felt they needed further assistance. However, these are the very customers who should be seeking lower levels of assistance each time they return. Instead, for the most part, these customers were re-enrolled in the program and were again provided with very similar services as they had been given the first time around. Not only does this practice concentrate limited resources on fewer numbers of participants than would be possible with increased emphasis on job search skills, but it also places participants in a position of dependence vis a vis program staff.

As an alternative, which some grantees demonstrated quite well, program staff can exercise more diligence in working with employers to uncover healthy employment situations for participants without compromising participants' opportunities to learn job-search skills. As an example of this:

> One program focused its job search assistance activities on "professional development" or career advancement instruction. Participants were encouraged to work with their employers to identify the tasks they must perform as a part of their jobs, and then develop measures of quality so that the participants knew when they were doing well. The program next provided instruction in "asking for training and other advancement opportunities" so that the workers could advance their careers. Three of the four participants we interviewed at this site had directly benefited from this instruction within months of starting their new jobs. Program staff indicated that providing such instruction up-front led to steady career advancement and prevented participants from returning for services they really did not need.

Matching Job Seekers with Native American Employers. In their efforts to create "sheltered" work experiences that meet participants' needs, programs tend to concentrate their efforts on employment opportunities among tribal agencies or departments or for (the limited number of) Indian-owned businesses. This matching can result in a rewarding and valuable experience for both employer and participant. Moreover, most programs made it part of their mission to meet the needs of Indian employers as a part of doing business, and providing such firms with a source of skilled workers very nicely served this function. Similarly, participants often express a strong preference for working in an Indian-owned firm, so their needs are being advanced as well. Since every urban area we visited was experiencing high levels of economic growth and low levels of unemployment, grantees found that matching participants with Native American employers was easier than it had been at any time in recent memory.

However, the more successful grantees discovered that there are several pitfalls to avoid in pursuing this strategy. Among these pitfalls, we encountered several situations in which tribal agencies or departments came to perceive that they were "owed" a particular number of participants in subsidized employment each year. Grantees sometimes obliged these agencies by sending a steady stream of participants, regardless of the work available or the skills or interests of the participants.

Similarly, grantees must be careful to strike a balance between the desire to place participants in Native American controlled work settings with the need to provide positions that pay well, offer good benefits and opportunities for advancement, and meet participants' other needs (e.g., convenience, ready access, etc.).

At one extreme, one program in an urban area was attempting to place all of its participants with Native American employers, and thus made almost no referrals to non-Indian businesses. As a consequence, participants were not made aware of good opportunities with non-Indian employers and did not have the chance to weigh the pros and cons of the alternatives for themselves. To take another example, a grantee located near a shopping mall offering wages in excess of $9 per hour referred a participant to an Indian-owned firm across town that required her to travel on two different buses each way for a wage of $5.50 per hour for a position that was physically demanding. While these represent extreme examples, they do speak to the larger and complex question of grantees' obligation to balance the needs of the participants with the needs of the employers, and the participants' short-term with their longer-term objectives, while helping participants make informed choices.

Matching Native American Job-seekers with non-Native American Employers. Another important theme identified by the grantees we visited was that of assisting participants in preparing for and transitioning to non-Indian employment environments. Like some of the services addressed above, these transition services must be navigated carefully. We found several successful, although not particularly institutionalized examples of such services that appear to be quite valuable to participants. In one case, much of the transition-related services took place during one-on-one counseling sessions between case manager and participant. In another case, a service provider took groups of participants seeking employment in urban areas on "field trips" to see what the work environments were like and meet with employees working in them.

Often, though, these services, however greatly needed, can "fall through the cracks," leaving participants unprepared for their jobs in their new environments. This can have negative repercussions beyond the individual cases. One employer contacted during a site visit indicated a reluctance to rely too heavily on the JTPA program for hiring assistance because former participants were not always prepared for the work or life challenges that awaited them.

Providing Post-placement Service and Supports. An extension of transition services, post-placement support is another valuable service provided by some grantees.

This service is potentially very important, because, due to limited job and career choices, many participants may settle for positions that are available rather than those in which they have a genuine interest. Case managers can play a valuable role in assisting participants in adapting to their new positions and in identifying their advantages (e.g., new skills they are likely to develop that will help them acquire more desirable positions over time).

The strategies used by grantees to provide post-placement support included periodic telephone "check-ins," using the moccasin telegraph to inquire (informally) about the status of participants, contacting the employer to discuss participants' progress, and visiting work-sites to insure participants are engaged in their work. Although we did not encounter them, we also heard about programs that matched participants with employers in a formal mentoring arrangement.

Although JPTA funds can be used to support post-placement activities, lack of funding was the most significant challenge faced by grantees in providing these services. Moreover, regulatory requirements do limit post-placement services to no more than 90 days after termination has occurred.

CONCLUSION

This chapter provided insight into the strengths and challenges of the TA services among the 23 grantees participating in this project. The programs, whether rural or urban, faced clear challenges including (1) identifying and building partnerships that enhance services and access to them, and (2) promoting empowerment as a theme within the programs through self-access services and technologies.

Overall, the ability of staff to exercise the whole person/whole family approach in designing service strategies for participants was a clear strength. Rather that attempting to "fix" participants, staff of INA programs exerted great effort to meet the immediate needs of participants in an effort to support the objective of livable wage employment. Participants appreciated this approach and felt that it was unique to JTPA INA programs.

As the world of employment and training/workforce development continues to change, Indian grantees face an opportunity to develop some key service strengths and market niches. One of these niches that appears to be in demand among customers may be the ability to help participants transition into a diverse workforce. Although many grantees attempt to smooth these transitions, in most cases, grantee staff set-up a white/Indian dichotomy to demonstrate differences. However, Indians who leave their reservations, and even those who do not, will increasingly encounter a more diverse workplace in which the rules (once perceived as white) will continue to change. Participants may need to be prepared to take advantage of these new situations.

Moreover, as employers, with ever-diverse markets, seek to diversify their workforces to better reflect their customers, Indian grantees, particularly urban grantees, may be in a good position to help their participants benefit from these trends.

X. INFLUENCES AND EFFECTIVENESS

Tribes and Indian organizations are enabled to receive funds from DOL by action of the U.S. Government based on the treaty relations that tribes have with the federal government. This concept was expanded upon in recognition of other federal laws and policies that established reservations; dissolved some reservations; relocated tribal people from reservations; provided education on and off the reservations; and then provided numerous federally-funded programs and services in areas where tribal people reside. The federal government was/is attempting to meet the treaty obligations by in essence "... providing health, education and welfare ... as long as the grass grows and water flows"—in other words, in perpetuity. These services are provided in exchange for the various concessions agreed upon by the federal government and the tribes (land, acquisition, peace, etc.). Special laws, attending rules, and regulations have been passed and amended to address the special, unique status of tribes and tribal people. Accompanying these congressional acts, funds were budgeted and appropriated.

Along these lines, this report has examined how funds have been used to provide employment and training services to Indians and Native Americans under Section 401 of JTPA. Preceding chapters have identified a number of important influences and constraints on the service design decisions of Section 401 grantees, and have as well made implicit or explicit judgements about the effectiveness of the resulting services to Indian and Native American participants and communities. In this chapter we summarize some of these observations in a general way.

INFLUENCES ON SERVICE DESIGN DECISIONS

As has been reiterated numerous times throughout this report, key influences on service designs include amount of funding, community and client needs, cultural factors, characteristics of the labor market, and tribal economic development, among other things.

Inadequacy of Funding

The amount of funds appropriated for the INA program is of primary concern in this evaluation. Because of where some of the projects are located (isolated, both geographically and social-culturally), there are few employment opportunities that translate into appropriate training opportunities. Hence, to meet Section 401 program requirements, the grantees must try to be flexible and adaptable to meet the needs of their clients. However, because of these situations, costs to provide needed or requested services are high. Moreover, access to scant employment opportunities or access to training may be difficult, because clients live in isolated areas. Thus, funding reductions, of the kind INA programs have recently experienced, easily translate into reduction in service delivery.

As mentioned in an earlier section, INA 401 grantees specified goals for their programs that mainly reiterate the goals in DOL's regulatory language. However, the sponsoring organizations, be it tribal or urban, have for the most part a more comprehensive philosophy—in effect, to "meet the needs of Indian/Tribal people," in keeping with the cultural value "to help others." The Section 401 program is only one part of their efforts to help others—a most meaningful part, but not their sole effort. Reduction of funds for Section 401 projects that were meager to begin with have forced these sponsoring agencies to shift to designs that are low cost, such as Training Assistance and Direct Placement. The reduction in funding thus has curtailed classroom training, support services, and community service employment, in quantity if not in quality. Work experience is still a priority in Section 401 project designs, but funding cuts limit the number who participate in it as well.

Community and Client Needs

The diverse employment training needs of prospective 401 participants are predicated on their need to provide for self and for their family. Further, there is a need, if possible, to obtain training near to them and, upon completion, obtain employment also near where they live. This report cites instances of 401 participants opting to train and work in their tribal communities, be it reservation or urban. The lack of employment opportunities on the reservation and client preferences to "work with an Indian organization" compound the grantees' efforts to meet their clients' needs. Clients are in turn faced with difficult choices that impact their successful termination: choosing appropriate training, obtaining employment compatible with their training, choosing to stay near their home community, or to relocate to obtain employment elsewhere. The sense of home community is strong among tribal people and many tribal people choose not to leave home to obtain employment or training for a variety of reasons. They may feel intimidated by unfamiliar surroundings, they may need the support of extended family (child care, transportation, etc.), they may not have sufficient life skills to prosper/survive in the new setting, or they may be unwilling to abandon the supports in their home community with which they are familiar. If appropriate options are unavailable, clients thus must make difficult choices—to obtain employment compatible with the training regardless of its location and sever ties with the home community, or choose not to move and risk becoming a "negative" terminee. These situations taken in combination represent decisions that are difficult and have a lifelong impact.

Labor Market

The labor market in Indian country plays a major factor on project design. If there are employment opportunities in the projects' service area, sites for on the job training and work experience and access to classroom training for a job in demand in the area may be available; INA services can then be designed with these opportunities in mind. However, if these opportunities are few or non-existent, then the grantees have a monumental task to meet clients' needs. How does one train a client in a field in which they are interested when employment opportunities are not there? The grantees can provide learning experiences that are of interest to the client but may have difficulty placing the client in that area; put differently, regardless of the training received, it may be to no avail if employment cannot be obtained. Weak labor markets are thus a pervasive influence on all aspects of service design and delivery, from the grantees' initial conceptualization of their program goals and objectives, to the types of services they rely on and make available to clients, and to the types of outcomes they can realistically expect.

A more sensitive influence associated with weak economies that grantees confront is the "problem" of client motivation. Indian people face many actual and perceived constraints in seeking employment. In situations where job availability is negligible, there may be fierce competition for those jobs. In those limited job markets (reservations), the Tribe may be the main source of employment. Although Tribes may not want to admit to this practice, tribal politics, family relations or "repayment" for past favors may play a part in who gets employed. This may not be different than any employment area, but it is perceived as such in many tribal communities. Some clients' efforts to obtain employment may be thwarted, regardless of their efforts to improve their employability through training. It is understandable then that the motivation to seek employment again and again could weaken one's resolve. Alternatives to not being able to be employed in the home area are to leave the home area to gain employment. This may have been tried and the client may have not succeeded for reasons mentioned before. Therefore, an unemployability cycle is begun and perpetuated. So, in some instances, some clients recycle themselves through the program time and again.

Tribal economic development programs also play a major role in employment on reservations, which effects 401 project designs. Tribes who either contract or compact federal monies or programs can provide a variety of employment opportunities. Through the Work Experience program, grantees can place clients with a variety of tribal programs, which may be of mutual benefit. For example, the client receives valued work experience and the tribe receives low-cost labor to provide more services to the community that may or may not be available otherwise.

As another coping strategy, Section 401 programs "depend" on partner agencies to provide a variety of support services that the grantee itself cannot afford. Key to the success of this effort is the experience and long-tenure of staff. As integral members of their communities, the 401-grantee staff can serve an important role in referring clients to social, health, housing, food, and child care services, in an effort to meet client needs. These staff have developed relationships and an understanding of resources available, who should be contacted and what the guidelines are to obtain services. This "institutional" knowledge by many of the grantee staff may influence small grantees to invest in human resources to provide a wide variety of services vs. investing in other project options.

Tribal Influences

Tribal culture exerts itself in subtle and complex ways. For example, it is understood among Indian people that one doesn't ask, "Are you Indian?" when interviewing a potential client...one asks "What tribe are you?" A base of understanding is thereby established, a starting point to make the potential client comfortable and ease anxiety that the client may be experiencing. Most generally the grantees' offices are decorated in an Indian motif, and walls with Indian paintings and posters announcing Indian events are prominent. There are Indian staff persons, some listening to Indian songs, and other Indian clients are about. There is thus an Indian feel to the office, and, to a lot of Indian people, this is comfortable and accepting—a place where Indian people feel they belong. There is information on the availability of tribal programs in a variety of social services, education, housing, and health areas. As the Indian staff continue the intake process, the Indian environment of the office and the cultural identity of Indian staff make the interview easier for the program candidate.

Cultural influence also manifests itself by the programs' participation in Tribal-Indian events, such as Pow-wows, health fairs, sports events, parades, educational workshops, career days, and awareness events, among others. Grantee staff are community members and, as such, participate in community events. In many situations, it may be difficult for the larger Tribal-Indian community to distinguish grantee staff from other private members of the community. Tribal languages may be utilized in some project offices and this too operates as a vehicle of cultural inclusion.

Finally, grantee staff and their clients typically know each other and each other's families by virtue of being members of the same community. Thus, they have a person-to-person, face-to-face relationship that comes from interacting directly in daily life: they go to the same stores, attend the same churches, see each other at community events, etc. This lends a degree of personalization and intimacy not typical in other job training or social service systems.

Many grantees discuss with clients cultural differences, not to orient clients in negative ways, but to acquaint clients with some non-Indian attitudes and expectations of employment. For example, some clients may be unfamiliar with the non-Indian perspectives of work and employment. Grantee staff thus feel a responsibility to share some of these perspectives, such as those relating to work attendance, work habits, work attitudes, inter-personal relations, and other employer perspectives. The emphasis of this orientation is to assist the Indian-Tribal client in operating effectively in the non-Indian world.

SOME THOUGHTS ON PROJECT EFFECTIVENESS

The dictionary defines "effective" as "having an expected or intended effect...prepared for use or action...producing or able to produce a desired effect...the capacity or power to achieve the desired result." Given this definition, grantees are achieving varying degrees of effectiveness. In the discussion below, we review some practices in both design and operations that are most effective overall and those which, although meeting some needs, are not as effective.

Among the programs' most effective attributes is the holistic approach to services, which constitutes a major plus for clients, many of whom have diverse needs that must be addressed in their attempt to become employed or employable. Each grantee in this study had a network of employers to which they could refer clients, or had health, social service, housing, food distribution, transportation or other services that enable clients to progress in their employment and training needs. As mentioned, cultural influences are prevalent, not so much in actual physical manifestations, but in environment, attitude, and understanding the ways that clients can relate to and feel good about their experiences with the grantee interaction.

Most of the grantees also had well-established systems to counsel and plan services for clients. As a result, clients receive individual attention, assistance, and monitoring as they progress through their training experience. Key, again, to the grantees' operations are the project staff. Time and again, as we interviewed staff, we became aware of their dedication, commitment, and sensitivity to meeting clients' needs. They also exhibited remarkable innovation and creativity in service planning, service delivery, and placing clients in employment.

There also appears to be good to excellent relations between classroom training providers and the Section 401 projects. Case managers for the most part had both formal and informal channels of communication with their service providers and in some instances could contact students if they missed class, didn't turn in a paper, or committed other such "minor" incidents. All this was done in an effort to assist the student to succeed in their training endeavors. The classroom service providers and case managers felt it important to "nip in the bud" student lapses by counseling with them. Similar efforts were made to assure that OJT, TA, CSE, and WEX clients maintained positive employment habits and positive attitudes during their employment experiences. Grantees thus endeavor to meet their client needs before the needs become so overwhelming that the student will dropout of the program or quit their job.

Grantees provide many services in their attempt at a holistic approach to service delivery, which appears to be one of the program's most effective elements, for the reasons mentioned above. Nonetheless, when looking across programs, the services themselves are of mixed effectiveness, with many programs demonstrating some very strong elements but with weaker elements also emerging. Basic skills classroom training, for example, is typically characterized by an open-entry/open-exit approach to services and is self-paced and geared to each student's own learning deficiencies. However, in some cases some programs, due partly to a lack of resources, have adopted an unstructured approach to instruction with minimal supervision by qualified instructors. Only clients who exert strong self-discipline and motivation for success—traits that can not always be counted on among students in basic skills instruction—are able to make progress; others find themselves floundering.

Work Experience and Community Service Employment are among the most frequently used service activities and can be very effective in addressing a wide range of client needs, both short-term and long-term, including their need for immediate income, pre-employment and work maturity skills training, career exploration, occupational skills training, and a boost to self-esteem. Moreover, these service activities also bestow substantial benefit to the community, by making available social services (e.g., child care, tribal administration, health services, etc.) that the tribe or community could otherwise not be able to afford. They are also very versatile service activities from the standpoint of providing good service designs even when employment opportunities and alternative training options are meager. At the same time, these activities are very costly and in some cases WEX or CSE assignments, even those of substantial duration, leave the client only slightly better off at the end of the spell of subsidized employment than they were at the outset, particularly when grantees do not ensure that training objectives are clearly specified.

Similarly, on-the-job training is used by some grantees very effectively, as when the OJT assignment has clear training goals and the client is provided with intense supervision and even mentoring, and permanent unsubsidized employment results when the training period ends. But some grantees take too little pains to ensure that their OJT assignments follow these guidelines, as when employers do not provide good quality training or the training plan is too formulaic.

In conclusion, project effectiveness is dependent on a wide variety of influences. If effectiveness is equated as meeting performance standards, then the projects in this study can be deemed to be highly effective. But not all is rosy nor are all programs above average. There are many positives and there are many "less than positive" aspects of some programs. To improve some of the less-than-positive aspects will take changes that may be beyond the capacity of the grantee in some cases (e.g., because of budget constraints) or require additional staff training.

The constraints in which Section 401 programs operate are formidable indeed. How does one create more jobs in an area that may not lend itself readily to economic development? How does one penetrate a labor market that may be less than accepting of native people and tribal cultures? How does one encourage native clients who choose to train or be employed near home to leave their home in pursuit of other opportunities? The Section 401 grantees face many challenges in addressing these other issues. There is no doubt that the Section 401 programs provide immeasurable assistance to Tribes and Indian communities; but additional input is needed in many cases to deem the program a total success. Perhaps DOL-Tribes-Indian organizations need to form alliances that can forge long-range employment plans that provide for a large influx of federal monies initially to stimulate economic development and, over a period of time, these federal monies could diminish as Indian communities realize economic self-sufficiency.

Currently, the balance of federal dollars and tribal/Indian self-sufficiency is uneven, creating a dependency on the federal dollar. What is needed is to stimulate the local economy enough to generate employment and loosen dependence on the federal dollar. Can the 401 program better contribute to economic development? Can better "alliances" be formed"? Regardless, Tribal-Indian self-sufficiency needs to become a reality. How to do it is not clear, but it must be done if tribal communities and Indian people are to achieve economic parity.

XI CONCLUSIONS AND RECOMMENDATIONS

Over the course of this three-year evaluation, study team members visited nearly two dozen grantees all around the country, including those whose JTPA allocations are among the very largest and very smallest, those in active urban economies and in economically depressed rural areas, and those run by tribal governments and non-profit organizations. We talked with scores of program staff and program participants and observed a broad array of training and employment activities, including GED classes, occupational skills classroom training, OJTs, work experience, community service employment, and training assistance. And we scrutinized the results from a very successful Administrator Survey, in which over 100 grantees participated, many of whom wrote lengthy and extensive comments on a wide range of topics.

Based on this wide-ranging data collection effort, we have gained a good understanding of not only the Section 401 program's strengths and weaknesses, but also what makes the program unique and, indeed, why there needs to be a separately funded program serving the Indian and Native American community. In this chapter, we summarize some of these observations and present some policy recommendations, as DOL moves to implement an Indian and Native American Program under the new Workforce Investment Act of 1998.

SUMMARY OBSERVATIONS

The results described in the preceding chapters of this Report provide extensive evidence about the operation of the INA program during the last years of JTPA. Without intending to summarize these findings (the reader is referred to the Executive Summary for this purpose), this chapter draws out some general implications of our findings.

At the level of federal oversight and policy, *the Department of Labor has over the last several years made enormous strides in forging a strong partnership* with the grantee community. Although the degree of cooperation evidenced in the DOL-grantee relationship has waxed and waned over the past decades, a fundamental underlying sense of mistrust, even antagonism, has characterized their interactions. DINAP's outgoing chief, Mr. Thomas Dowd, who is himself a Native American and a former grantee director, has worked hard to dispel suspicion and forge a constructive dialogue. Although some grantees remain wary, the last several years have as a consequence witnessed an extraordinary transformation in the way DINAP is perceived. To an extent unforeseen only a few years ago, grantees now feel a strong sense of ownership towards "their" program and are working cooperatively with DINAP on all matters affecting program policy. Based on this foundation, the INA program is now well positioned to develop a sound future under the new Workforce Investment Act.

In terms of service design and delivery, this future will doubtless reflect the unique role that INA programs play in the employment and training system and the many special strengths that were in evidence among the programs we studied. To begin with, INA grantees epitomize *the holistic approach to services*. Programs we studied were inordinately conscious of viewing clients as whole people rather than as instances of symptoms to be treated. This approach often extended to a consideration of the needs of other members of the participant's family and the ways in which family dynamics needed to be taken into account to promote the individual's own success.

The notion of holistic services was expanded as well to the conceptualization of the *grantee community as a constituency in its own right and as an important beneficiary of the services* that were being provided to individuals. Thus, grantees sometimes needed to strike a balance between deciding how to meet the needs of individuals for employment and training assistance while ensuring that the community's own larger interests were being advanced as well. The ways in which Work Experience and Community Service Employment are used clearly exemplify this.

The importance of community surfaced in another way as well, particularly for programs operating away from a tribal setting. In such environments, participants (and potential participants) often feel estranged and alienated from the mainstream culture and look to the organization operating the Section 401 grant as providing a needed sense of belonging. Moreover, participants take great comfort in knowing that their needs for assistance can be met by *program staff that share a common ethnic identity as Native Americans and are sensitive to tribal cultures*. So important is this shared identity that many participants would not avail themselves of similar services that might be made available from a non-Native American organization.

For their part, grantees, again particularly those in non-tribal settings, *become a focal point for community identity*. As such—and, again, reflecting their holistic approach to services and their focus on meeting individual as well as community needs—they use funds from a variety of sources to organize cultural activities and events, promote native arts and crafts, run programs for senior citizens, operate Food Banks for the needy, publish community newsletters, and the like. The strong sense of community engendered by these efforts is largely irreplaceable and constitutes one of the strongest aspects of the uniqueness of the INA program. Although many of these subsidiary efforts rely on non-401 funds and a strong spirit of volunteerism, the JTPA allocation constitutes the bedrock for the grantees' very existence and thus must be viewed as the foundation of these myriad efforts.

Grantees operating in tribal settings, by contrast, to a much lesser degree serve as the community's focal point, because so many other tribal agencies and institutions can play this role. Instead, the *JTPA program must be viewed as constituting an integral cog in a wider network of services developed from other funding streams, used in tandem to meet the needs of individuals and the community.*

The above considerations suggest the importance of evaluating the INA program in context. The importance of context is suggested as well by the fact that *grantees are operating their programs in extraordinarily diverse and often extremely difficult circumstances, typically with very limited funding.* For example, service areas in many instances are marked by high rates of joblessness, physical isolation, and extreme economic deprivation. Fashioning an employment and training program in such circumstances poses special challenges and gives rise to difficult decisions regarding how a job training program should focus its energies in the face of a dearth of unsubsidized job opportunities of any kind.

The importance of context suggests that it is very difficult to analyze specific aspects the Section 401 program (such as specific training activities) in isolation. In a real sense, in fact, the value of the program is much greater than the sum of its component parts. Thus, specific activities or services, when viewed in isolation, often seem unexceptional, but the INA programs taken as a whole play *a critical role in promoting the vitality and well being of Indian and Native American individuals and communities.*

RECOMMENDATIONS

Based on our extensive examination, we are convinced of the critical role that the INA program plays for the people and communities they serve. We applaud the efforts of grantees who design and deliver quality services in the face of inordinately difficult challenges, not the least of which is a serious shortfall of job training dollars.

At the same time, we have drawn on our study's findings to formulate a number of recommendations, which we have formulated at the level of federal policy and practice and the level of the grantee service design and delivery.

Federal Policy and Practice

1. *DOL must take seriously, as it has begun to do over the last several years, its obligation to work in partnership with the grantee community.* Recent initiatives undertaken by the Division of Indian and Native American Programs (DINAP), in conjunction with the Division of Performance Management's Office of Policy and Research (OPR), have been successful in enabling grantees to feel ownership of their program. DOL and grantees are now negotiating in a spirit of openness and cooperation to make important decisions about the program's operation and future direction. Given that Mr. Dowd has recently announced that he will be stepping aside as Chief of DINAP, DOL needs to ensure that his successor is as committed to dialogue and partnership as he was. The initiatives that Dowd began should not be allowed to falter.

2. *DOL needs to ensure that all grantees have the opportunity to participate in the partnership initiative.* Results from our Administrator Survey suggest that some grantees, while applauding the partnership initiative, feel that they have not had full opportunity to participate. Although Work Groups and advisory bodies can understandably include just handfuls of members, DOL should ensure that all grantees have ample opportunity to express their opinions on matters affecting the program. Where it would not be too disruptive, Work Group or partnership bodies should include provisions for rotating memberships, and efforts need to be made to see that all grantees, including tribal and non-tribal programs and those that are large and small, are well represented. DOL's recent initiative to promote Internet access for all grantees may provide an additional vehicle for giving all grantees the chance to participate in a dialogue.

3. *DOL needs to work with grantees to ensure that new regulations for the Section 401 program are clear, concise, and grant ample flexibility to grantees to design and operate their programs in accordance with the needs of their communities.* The recently enacted Workforce Investment Act (WIA) of 1998 supplants JTPA, but still allows a provision for a separate, national Indian and Native American Program. Doubtless, DINAP will need to craft new regulations for the program under WIA. In keeping with recommendations expressed above, new regulations should be developed with the full cooperation of the grantee partners. In recognition of the great diversity of contexts within which the INA program operates, we recommend that these regulations permit ample flexibility to grantees for designing programs that are responsive to local needs. Overly restrictive provisions on service designs that are not statutorily mandated should be avoided. Any new regulations, as well as all other DOL issuances (e.g., DINAP Bulletins), should also be written with an eye to simplicity and clarity.

4. *The new regulations need to permit WIA funds to be used to promote diverse individual and community needs, including economic development if possible.* Lack of adequate job opportunities and weak economies are among the biggest obstacles Section 401 grantees face in accomplishing their program objectives. Given these circumstances, concerted efforts should be made to spur economic development in Native American communities. The JTPA Amendments of 1992 placed severe restrictions on the use of JTPA funds for economic development activities, effectively eliminating a promising Community Benefits Projects (CBP) initiative that had previously been permitted in the INA program.[1] To the extent that it is allowable under WIA, we encourage DOL to consider reinstating provisions for Community Benefits Projects, or similar initiatives to allow WIA funds to be used to promote, or in conjunction with, economic development efforts.

5. *DOL should forge ahead with plans to revamp the performance standards system for the INA program, to reflect the wide diversity of grantees' circumstances and accomplishments. At the same time, it must be careful to ensure adequate accountability at the national level.* Grantees are clearly ambivalent about the current performance measurement system. Although the current measures are generally perceived as being reasonable and fair, many grantees also feel these measures do not fully reflect their programs' chief accomplishments. Thus, DOL's recent efforts to work in partnership with the grantee community to develop a revised performance-standards system seem wholly appropriate. The recent enactment of the Workforce Investment Act should not delay these efforts.

   The twin themes of this new legislation are, on the one hand, to devolve substantial authority for decision-making to local programs, and, on the other, to ensure that local programs are held strictly accountable for their performance. In keeping with these themes, DOL should ensure that new performance measures (as well as program regulations in general) impart substantial flexibility, while at the same time ensuring that adequate accountability mechanisms are in place. This will require that any new performance-standards system provide meaningful and substantial measures of accountability. Additionally, the new measures need to be supported by an adequate reporting vehicle that includes clear definitions of key terms and the valid and reliable measurement and reporting of key concepts.

6. *DOL needs to ensure that additional attention is paid to the needs of grantees for technical assistance and training, especially those who are new Directors, and that grantees have adequate opportunity to engage in dialogue with their peers and DINAP's Federal Representatives.* Any new flexibility imparted under WIA implies as well that grantees be provided with sufficient opportunities to learn how to take advantage of that flexibility by designing effective and innovative services. Along these lines, although the technical assistance and training (TAT) that has been

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[1] The provisions of CBP allowed grantees to use a limited amount of their JTPA funds to engage in workforce development and training in the context of promoting local economic development.

provided heretofore has been adequate overall, certain segments of the grantee population, especially new Directors, have not received sufficient guidance.

In general, capacity building needs to also be promoted, and grantee staff should have the opportunity to build their skills in all areas. Assessment is a particular area in which programs might benefit from additional capacity in the years ahead. Participants will increasingly need to improve their skills to compete in the labor market; schools' and employers' expectations and requirements have risen over the past decade and will continue to place more importance on excellent academic and workplace skills into the next century. In this context, a careful assessment should be the foundation upon which participants' services are based. Without a thorough knowledge of participants' interests and abilities, service plans can be made based only on a general feeling for the clients' capabilities and long-term needs, and thus risk missing the mark. Given this, staff will need to have training on how best to access assessment results and how to interpret them.

Grantees could also benefit from efforts to learn about what their colleagues are doing, including through peer-to-peer exchanges. DOL should also continue its recent efforts to ensure that grantees have adequate opportunity to meet individually with DINAP's Federal Representatives.

Grantee Service Design and Delivery

7. *To ensure more equitable access to services, grantees should avoid an over-reliance on word-of-mouth referrals. For the same reason, they need to make provisions for reaching potential applicants throughout their service areas, through outstationing staff and forging partnerships with other social service agencies.* Outreach and recruitment efforts currently being undertaken are clearly adequate for ensuring a constant flow of participants. However, some grantees rely almost exclusively on indirect recruitment methods, especially word-of-mouth referrals, and this has sometimes made it difficult for potential applicants who are less well connected in the community to be made aware of services. Thus, some participants with whom we spoke, who eventually heard about the program through a friend or relative, told us that they wished they had learned of the program's existence years earlier.

   An additional difficulty that grantees experience in ensuring an equitable access to services is in reaching potential participants throughout the entirety of the grantees' service areas. Achieving this objective is an especially difficult challenge for those grantees serving physically vast territories but who find it financially infeasible to establish separate field offices, due to their very limited funding. In such cases, grantees can follow the lead of many of their colleagues who outstation staff, use roving recruiters, and develop effective joint referral linkages with other social service and tribal programs. As the new WIA legislation takes hold, linkages with the nation's emerging One-Stop systems can be an especially promising practice that is rife with opportunity, as a few grantees have already demonstrated. Thus far such linkages appear to be underutilized.

8. *While grantees need to attend to participants' immediate needs for income and employment, they need to address clients' longer-term needs as well.* We found that

clients often had strong opinions about what services they wanted and needed in the short-run, typically including obtaining immediate employment (subsidized or unsubsidized), driven by their need for immediate income. Consequently, Section 401 grantees often emphasized addressing participants' shorter-term needs, sometimes to the neglect of their longer term needs, and resulting in quick-fix solutions and a "revolving door" approach to services. We recognize that grantees often find themselves severely constrained by limited budgets and other factors. We also appreciate that they must be responsive to the expressed preferences of their clients. To the fullest extent possible, however, grantees should promote long-term solutions and structure service strategies to advance participants' longer-term interests while attempting to address their needs in the short run. Suggestions for how to do so are embedded in some of the recommendations that follow.

9. *Grantees who are not located in reasonable proximity to service providers for Classroom Training can utilize distance learning or alternative delivery vehicles.* Extreme physical isolation is a major impediment to making the full-range of classroom training services available to participants, at least among some grantees. Alternative or innovative service delivery vehicles can be pursued in these circumstances, including distance learning or other on-line classroom services. The greater access to technology among both grantees and participants will make this more and more feasible.

10. *Grantees need to ensure that On-the-Job Training is accompanied by a clear training plan, specifying the specific skills the participant is expected to learn, and in fact provides training opportunities commensurate with the employers' wage reimbursements.* On-the-job training (OJT) has great potential as a service activity in imparting meaningful skill gains and leading to permanent employment, and to this degree can clearly be said to address participants' longer-term, as well as short-term, needs. However, to realize this potential to the fullest, grantees must ensure that the participant's training plan is clearly specified, that the work assignment imparts meaningful skills that are transferable across employers, and that the employer provides adequate supervision and mentoring. Moreover, grantees should have the expectation that employers will continue to hire the trainee once the training period has ended, and limit their involvement with employers who fail to do so. Many of the OJTs we studied exemplified these characteristics, but many others did not. Grantees should ensure that all OJTs attempt to promote high-quality design principles.

11. *Work Experience assignments of substantial duration should also be structured to provide real and meaningful training.* Work Experience (WEX) serves very diverse objectives and is used by grantees in very different ways. In some cases, WEX is deliberately and appropriately structured as a short-term or stopgap work assignment, as when participants are given short-term WEX positions while undergoing job search or as a way of providing exposure to the world of work and boosting self-esteem. Very often, however, WEX assignments are of substantial duration (e.g., up to the 6-month limit). In these cases, grantees should ensure that

training objectives are clearly specified and the participants' are learning valuable occupational skills. By doing so, grantees can again promote participants' long-term needs for quality skill development, as well as their short-term need for immediate income.

12. *For participants interested simply in direct placement assistance, grantees need to ensure that they provide not only job referrals, but also that they build participants' job search skills.* Section 401 grantees very appropriately often provide direct placement assistance. In doing so, they should avoid simply giving job referrals, especially when participants seem to lack good job search skills. In such cases, grantees that provide training in job search skills boost participants' self sufficiency and empower them to seek and find their own jobs in the future, minimizing their subsequent need for the program's assistance.

Appendix A
The Administrator Survey

SECTION 401 JTPA
PROGRAM ADMINISTRATOR SURVEY

Dear Grantee Partner:

The Native American Employment and Training Council (the Advisory Council) and the Department of Labor's Division of Indian and Native American Programs (DINAP) agreed to have an evaluation conducted of the Job Training Partnership Act, Section 401 Indian and Native American Program, to better understand the program's effectiveness and participant outcomes.

This comprehensive study is being conducted by Social Policy Research Associates and American Indian Research and Development. The study has two components. The first, was completing a series of randomly selected program site evaluations; all have been completed. The second and final component of the study is my reason for writing this letter. I am asking for your cooperation in completing the enclosed voluntary survey.

The survey is intended to assess grantee satisfaction with the services and guidance received from the Department of Labor, to learn the greatest obstacles grantees face in obtaining successful outcomes for participants, and to learn about factors determining grantee service strategies. The survey is designed to be completed by the Section 401 JTPA program administrator and includes questions divided into three sections: I. Program Goals and Organization Structure; II. Services Provided by the Department of Labor; and III. Services Provided to Participants. Please complete each section and return the questionnaire in the enclosed postage-paid envelope within the next two weeks.

You can be assured that your answers will be kept strictly confidential and not shared with any person associated with the DINAP program office. The Department will receive a final report that does not identify source documentation by any survey contributor.

I want to emphasize that your participation is critical to the process of continuing to improve our partnership based on trust, respect and commitment to purpose. The survey results will ultimately help the Advisory Council and DINAP with improving our services to you and your participants, the ultimate customers.

Thank you in advance for helping to improve our partnership by completing and returning the survey. Any questions regarding the survey should be referred directly to Ron D'Amico of Social Policy Research Associates, at 415-617-8628. Questions about the study in general can be directed to Dr. D'Amico or to Stu Tonemah of American Indian Research and Development, at 405-364-0656.

Sincerely,

THOMAS M. DOWD
Chief, Division of Indian
and Native American Programs

BEST COPY AVAILABLE

JTPA SECTION 401
PROGRAM ADMINISTRATOR'S SURVEY

ABOUT THE SURVEY

This survey about the JTPA Section 401 Indian and Native American Program is being conducted by Social Policy Research Associates and American Indian Research and Development for the U.S. Department of Labor. The survey was developed with input from members of the Native American Employment and Training Council and other members of the grantee community. Its purposes are to assess grantee satisfaction with the guidance and services received from the Department of Labor and to learn about grantees' service strategies and the obstacles they face in meeting the needs of their participants. Your opinions are very important to us in providing the Department of Labor with an accurate picture of grantees' concerns. Therefore, we would appreciate very much if you would take the time to answer the survey and return it to us in the postage-paid envelope within the next 2 weeks. *Please note that your answers will be kept strictly confidential* and will be made available to the Department of Labor only in the form of summary tabulations, where your answers will be combined with those of other grantees.

Thank you very much for your help.

FOR FURTHER INFORMATION

If you have any questions about the survey, please feel free to call:

Ronald D'Amico, Social Policy Research Associates
(650) 617-8628, or

Stuart Tonemah, American Indian Research and Development
(405) 364-0656, or

Thomas Dowd, Chief, Division of Indian and Native American Programs,
U.S. Department of Labor, (202) 219-8502

OMB Approval Number: 1205-0380
Expiration Date: 2/28/98

PART I: PROGRAM GOALS AND ORGANIZATION STRUCTURE

The questions in this section ask some information about your organizational structure, sources of funds, and the goals you have established for your JTPA Section 401 Indian and Native American Program. Some of these questions ask specifically about funding your organization accessed in program year (PY) 1996, which ran from July 1, 1996 to June 30, 1997.

STAFFING

1. How many people work for your JTPA Section 401 Program, including those in all field offices, whose salaries are wholly or partly paid for by JTPA?:
(PLEASE FILL IN NUMBERS)

________ full-time staff whose salaries are wholly paid for by JTPA (excluding work experience/community service participants)

________ part-time staff, or full-time staff whose salaries are only partly paid for by JTPA (excluding work experience/community service participants)

________ work experience or community service participants working in your offices full- or part-time

OTHER SOURCES OF FUNDS

2. In addition to your Section 401 funds, does your organization receive grants from other sources to provide education, training, or social services for people in your community?
(PLEASE CIRCLE ONE NUMBER)

Yes ....2 **(continue with question 3)**
No ....1 **(skip to question 6)**

IF YES TO QUESTION 2:

3 From how many separate sources did your organization receive funds in PY 96, including your Section 401 JTPA grant?
(PLEASE FILL IN NUMBER)

________ separate sources of funds

4 What is the total dollar amount of these funding sources in PY 96, including your JTPA grant?
(PLEASE FILL IN NUMBER)

$__________________ dollars from all funding sources

Persons are not required to respond to this collection of information unless it displays a currently valid OMB control number. We estimate that it will take an average of 30 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Labor, Office of Policy and Research, Room No. N-5637, Washington, D.C. 20210 (Paperwork Reduction Project 1205-0 380, expires 2/28/98).

5 What are the *non*-Section 401 sources of money used for?
(PLEASE CIRCLE ALL THAT APPLY)

1 Health services
2 Legal services
3 Food distributions
4 Family services (for example, family counseling, adoption services)
5 Educational services (for example, tutoring)
6 Job training
7 A Seniors program
8 Community economic development
9 Other ____

PROGRAM GOALS

6 INA grantees manage and operate their programs in circumstances that are generally unique to the population served and within a Native American and Indian cultural context. Given the context within which your program operates, what would you say are the most important goals for your JTPA Section 401 program?
(PLEASE CIRCLE ONE NUMBER FOR EACH ITEM)

	Extremely Important	Quite Important	Somewhat Important	Not At All Important
a. Providing participants with training	4	3	2	1
b. Helping participants find jobs	4	3	2	1
c. Helping participants achieve self-sufficiency	4	3	2	1
d. Assisting participants with their supportive needs (for child care, counseling, transportation assistance, and so on)	4	3	2	1
e. Providing participants with temporary income while they are in training or subsidized employment	4	3	2	1
f. Providing a place in the community where people know they can come for help	4	3	2	1
g. Other (specify) ______________________ ______________________ ______________________	4	3	2	1

PART II: SERVICES PROVIDED BY THE DEPARTMENT OF LABOR

The questions in this section ask you to assess the responsiveness of the services provided by the U.S. Department of Labor's (DOL) Employment and Training Administration, including the Division of Indian and Native American Programs (DINAP). We are especially interested in knowing what DOL and DINAP could be doing differently to help you better meet the needs of your participants and community. Of course, your answers are completely confidential; no office within DOL will know how you respond.

POLICY GUIDANCE

7. As part of its grant management responsibilities, DINAP is responsible for developing program direction for Section 401 grants. This includes setting priorities that result in making the program easier to understand and implement (e.g., streamlining regulations, improving reporting requirements, approving general waivers, etc.). How would you rate the following statements about the **policy guidance** provided by DINAP?
(PLEASE CIRCLE ONE NUMBER FOR EACH ITEM)

	Agree Strongly	Agree Somewhat	Disagree Somewhat	Disagree Strongly	No Opinion
a. DINAP clearly communicates the program's policies	4	3	2	1	9
b. Our program has enough flexibility under the JTPA grant to address the needs of our participants	4	3	2	1	9
c. Program regulations are too complex	4	3	2	1	9
d. The recent partnership efforts undertaken by DINAP to change the program regulations are greatly needed	4	3	2	1	9
e. DINAP's current partnership initiative makes it easier for my program to have a say in decisions regarding program policies	4	3	2	1	9

TECHNICAL ASSISTANCE

8. DINAP, in partnership with the National Indian and Native American Employment and Training Conference and grantee regional organizations, co-sponsors training and technical assistance designed to assist grantees to improve their program management and provide better service to participants. DINAP also periodically issues Bulletins and maintains a Web site, and its staff are available to provide support over the phone. How would you rate the following statements about this **technical assistance**?
(PLEASE CIRCLE ONE NUMBER FOR EACH ITEM)

	Agree Strongly	Agree Somewhat	Disagree Somewhat	Disagree Strongly	No Opinion
a. The technical assistance at the national conferences meets the needs of grantees	4	3	2	1	9
b. The one-on-one (Fed. Rep./Grantee) sessions held at conferences help to meet grantees' specific needs	4	3	2	1	9

8. **Technical Assistance (continued)**

(PLEASE CIRCLE ONE NUMBER FOR EACH ITEM)

	Agree Strongly	Agree Somewhat	Disagree Somewhat	Disagree Strongly	No Opinion
c. The regional conferences provide a good opportunity to get assistance from fellow grantees	4	3	2	1	9
d. I support the use of peer-to-peer (grantee-to-grantee) technical assistance	4	3	2	1	9
e. The DINAP Bulletins provide important information about program requirements	4	3	2	1	9
f. I access the Internet to obtain information from DINAP that benefits my program	4	3	2	1	9
g. DINAP's partnership efforts have increased my willingness to ask questions from the Fed Reps when needed	4	3	2	1	9
h. DINAP staff provides accurate information when our program asks specific questions	4	3	2	1	9
i. DINAP answers our questions promptly	4	3	2	1	9

9. Please describe how technical assistance can be improved.

REPORTING

10. As part of the exchange of information between DINAP and the grantees, grantees are required to submit periodic reports, including planning documents, semi-annual reports, and the Annual Status Report. As part of the recent partnership initiative, many changes were made to this reporting process to improve the accuracy and timeliness of reporting. These changes included switching from quarterly to semi-annual reporting and eliminating unnecessary line items on the Annual Status Report. How would you rate the following statements about the **reporting process**?
(PLEASE CIRCLE ONE NUMBER FOR EACH ITEM)

	Agree Strongly	Agree Somewhat	Disagree Somewhat	Disagree Strongly	No Opinion
a. The recent revisions to the reporting forms make them easier to use	4	3	2	1	9
b. The reporting forms are still too complicated	4	3	2	1	9
c. The Annual Status Report covers all the information that needs to be reported	4	3	2	1	9
d. Submitting reports electronically is very convenient	4	3	2	1	9

11. Please describe how the reporting process can be improved.

____

____

____

____

CONSULTATION

12. The partnership efforts undertaken by DINAP, grantees, and the Native American Employment and Training Advisory Council have attempted to improve communication and dialogue between all partners. How would you rate the following statements about the **consultation process**?
(PLEASE CIRCLE ONE NUMBER FOR EACH ITEM)

	Agree Strongly	Agree Somewhat	Disagree Somewhat	Disagree Strongly	No Opinion
a. The partnership effort has made working with DINAP a more positive experience	4	3	2	1	9
b. The partnership effort has established trust and respect between DINAP and grantees	4	3	2	1	9
c. DINAP does a good job of getting opinions from grantees before making decisions	4	3	2	1	9
d. The Internet is a good way of giving and receiving information	4	3	2	1	9

13. Please describe how the consultation process can be improved.

____

____

____

____

____

____

MANAGEMENT INFORMATION SYSTEMS

14. How useful to you would it be if DOL were to develop an automated Management Information System (MIS) computer software for free distribution to grantees? This software would be for you to use for your own purposes on your computers for: entering information about participants at intake, tracking changes in status, recording case notes, recording outcomes, and producing reports.
(PLEASE CIRCLE ONE NUMBER)

Extremely useful	4
Quite useful	3
Somewhat useful	2
Not at all useful	1
Not sure	9

INFORMATION TECHNOLOGY PROJECT

Please answer the following questions about the Information Technology Project.

15. We are an "on-line partner."
(PLEASE CIRCLE ONE NUMBER)

Yes	2	**(continue with question 16)**
No	1	**(skip to question 18)**
Not sure	9	**(skip to question 18)**

IF YES TO QUESTION 15:

16. We check our e-mail at least once a week
(PLEASE CIRCLE ONE NUMBER)

Yes 2
No 1
Not sure 9

17. Please answer the following additional questions about the Information Technology Project.
(PLEASE CIRCLE ONE NUMBER FOR EACH ITEM)

	Agree Strongly	Agree Somewhat	Disagree Somewhat	Disagree Strongly	No Opinion
a. I enjoy receiving the DINAP "Hot News Flash"	4	3	2	1	9
b. The DINAP Home Page and Netforum are very useful to grantees	4	3	2	1	9

PERFORMANCE STANDARDS

18. Currently, performance standards in the Indian and Native American program are established for three outcomes—the entered employment rate, the employability enhancement rate, and the positive termination rate. Grantees are expected to meet minimum standards established by DOL on at least 2 of these 3 outcomes. As part of the partnership initiative, DINAP is currently meeting with a Work Group to assist in evaluating these measures and perhaps modifying them. To inform this process, it would be helpful if you would answer the following questions. How much do you agree or disagree with the following statements about **performance standards**?
(PLEASE CIRCLE ONE NUMBER FOR EACH ITEM)

	Agree Strongly	Agree Somewhat	Disagree Somewhat	Disagree Strongly	No Opinion
a. I understand the current performance standard system	4	3	2	1	9
b. Overall, our program is satisfied with the current performance standards system	4	3	2	1	9
c. Performance standards provide targets that help us improve our program performance	4	3	2	1	9
d. The model-adjustments DOL uses to establish minimum standards for each grantee are too complicated	4	3	2	1	9
e. The process DOL uses to adjust performance standards is fair	4	3	2	1	9
f. The performance measures used by DOL do not adequately reflect the goals or accomplishments of our program	4	3	2	1	9

18. **Performance standards (continued)**
(PLEASE CIRCLE ONE NUMBER FOR EACH ITEM)

	Agree Strongly	Agree Somewhat	Disagree Somewhat	Disagree Strongly	No Opinion
g. Performance standards established by DOL focus too much on job placements	4	3	2	1	9
h. The use of employability enhancements as an outcome has helped us focus on the need of our participants for longer-term training	4	3	2	1	9
i. The definitions of employability enhancements are too difficult to understand	4	3	2	1	9
j. The current outcomes give us enough flexibility in running our program	4	3	2	1	9

19. How would you improve the measurement of performance used by DOL?

____

____

____

____

OVERALL HELPFULNESS

20. **Overall**, how helpful is the assistance you received from DINAP in accomplishing your program objectives?
(PLEASE CIRCLE ONE NUMBER)

Extremely helpful	4
Quite helpful	3
Somewhat helpful	2
Not at all helpful	1

21. What additional services or assistance would you like from DOL but have not received?

____

____

____

OTHER DOL FUNCTIONS

22. The questions in this section ask you about other offices within the Employment and Training Administration of DOL that have some responsibility for administering JTPA grants. How satisfied are you with the services you receive from these **other offices**?
(PLEASE CIRCLE ONE NUMBER FOR EACH ITEM)

	Very Satisfied	**Somewhat Satisfied**	**Somewhat Dissatisfied**	**Very Dissatisfied**	**No Opinion**
a. The Office of Grants and Contract Management, Div. of Acquisition & Assistance	4	3	2	1	9
b. The Division of Resolution and Appeals	4	3	2	1	9
c. The Closeout Unit	4	3	2	1	9
d. The Office of Performance Management and Evaluation	4	3	2	1	9

PART III: SERVICES PROVIDED TO PARTICIPANTS

The questions in this final section ask you to describe the services that you generally provide to participants and to note the factors that make it difficult for them to succeed.

ASSESSMENT AND SERVICE PLANNING

23. In what areas do you assess your participants before they are assigned to a specific training or other service activity?
(PLEASE CIRCLE ONE NUMBER FOR EACH ITEM)

	Assessed for All Clients	**Assessed for Most Clients**	**Assessed for Some Clients**	**Not Assessed**
a. Reading skills	4	3	2	1
b. Math skills	4	3	2	1
c. Occupational interests	4	3	2	1
d. Occupational skills or aptitudes	4	3	2	1
e. Previous work experience	4	3	2	1
f. Barriers to participation in training or employment	4	3	2	1
g. Life Skills	4	3	2	1
h. Other ______________________ (please specify)	4	3	2	1

24. What methods of assessment are used for each of these areas?

	Formal Tests	Informal Methods/ Interviews	Both Formal & Informal Methods	Not Assessed
a. Reading skills	4	3	2	1
b. Math skills	4	3	2	1
c. Occupational interests	4	3	2	1
d. Occupational skills or aptitudes	4	3	2	1

25. How influential are the following factors in determining which types of ser vices participants will receive?
(PLEASE CIRCLE ONE NUMBER FOR EACH ITEM)

	Extremely Influential	Quite Influential	Somewhat Influential	Not At All Influential
a. Results of basic skills assessment	4	3	2	1
b. Results of assessment of interests or aptitudes	4	3	2	1
c. Availability of training services in the area to meet participant's needs	4	3	2	1
d. Participant's own preferences	4	3	2	1
e. Participant's ability/inability to support self through training	4	3	2	1
f. Lack of program funds to offer the types of training the participant might really want or need	4	3	2	1
g. Lack of child care that makes it difficult for participant to undertake training	4	3	2	1
h. Lack of transportation that makes it difficult for participant to undertake training	4	3	2	1
i. Other ______________ (please specify)	4	3	2	1

We now have a number of questions about the services that participants received **who terminated during PY 96, the program year that ran from 7/1/96 to 6/30/97**. Note that these questions focus on PY 96 ***terminees only***, not all program participants.

26. According to your Annual Status Report, the number of persons who terminated from your program in PY 96 was

_________ persons **terminated in PY 96**

27. Among persons who **terminated in PY 96**, how many were served with **training assistance and/or supportive services BUT NO OTHER** training activity or subsidized employment? *(PLEASE FILL IN NUMBER)*

_________ persons terminated with training assistance or supportive services ONLY, or

DK ......(Circle if you don't know)

28. Among persons who **terminated in PY 96**, how many received the following services? *(PLEASE FILL IN NUMBER OF TERMINEES ON EACH LINE)*

_________ Basic skills classroom training

_________ Occupational skills classroom training

_________ On-the-job training

_________ Work experience

_________ Community service employment

DK ......(Circle if you don't know)

29. Among persons who **terminated in PY 96**, how many received more than one of the services identified in question 28? *(PLEASE FILL IN NUMBER)*

_________ persons terminated in PY 96 after receiving more than 1 type of training or subsidized employment, or

DK ......(Circle if you don't know)

PLEASE CONTINUE ON THE NEXT PAGE

30. What proportion of your PY 96 JTPA terminees received the following services?
(PLEASE CIRCLE ONE NUMBER FOR EACH ITEM)

	Almost All	Many	Some	Almost None	Not Sure
a. Transportation assistance	4	3	2	1	9
b. Health care	4	3	2	1	9
c. Family care (including child care)	4	3	2	1	9
d. Personal or family counseling	4	3	2	1	9
e. Housing or rental assistance	4	3	2	1	9
f. Relocation assistance	4	3	2	1	9
g. Tools, equipment, and clothing	4	3	2	1	9
h. Meals and other nutritional assistance	4	3	2	1	9
i. Stipends or help in obtaining financial assistance	4	3	2	1	9

31. How important are each of the following factors in making it difficult for you to meet the needs of your JTPA Section 401 participants?
(PLEASE CIRCLE ONE NUMBER FOR EACH ITEM)

	Very Important	Quite Important	Somewhat Important	Not Very Important
a. Restrictions and limitations imposed by DOL on how our JTPA Section 401 funds can be spent	4	3	2	1
b. JTPA Section 401 performance standards requirements	4	3	2	1
c. Lack of adequate training providers in the area who can serve my clients	4	3	2	1
d. Lack of adequate job opportunities in the area	4	3	2	1
e. Lack of funds to provide the services our participants really need	4	3	2	1

32. How important are each of the following characteristics of your participants in explaining why some of them don't achieve their goals while in your program? Participants:
(PLEASE CIRCLE ONE NUMBER FOR EACH ITEM)

		Very Important	Quite Important	Somewhat Important	Not Very Important
a.	Lack motivation	4	3	2	1
b.	Don't understand what it takes to get and keep a good job	4	3	2	1
c.	Lack the reading and writing skills they need to succeed	4	3	2	1
d.	Have family responsibilities or problems that make it difficult for them to complete training or maintain employment	4	3	2	1
e.	Lack transportation to training or employment	4	3	2	1
f.	Have problems with substance abuse	4	3	2	1
g.	Are reluctant to pursue distant job opportunities because of their community ties	4	3	2	1
h.	Have difficulty regularly attending training or employment activities due to their desire to attend cultural ceremonies	4	3	2	1
i.	Are gang members, which interferes with their motivation to succeed	4	3	2	1
j.	Lack work experience or good work skills	4	3	2	1
k.	Lack the necessary life skills	4	3	2	1
l.	Other ____________________ (please specify)	4	3	2	1

Outcomes

33. Of participants **placed in jobs at termination in PY 96**, what percentage were placed in:
(PLEASE FILL IN PERCENTAGES)

Tribal Government or Agencies .... _________%
Tribal Enterprises .... _________%
Non-Tribal or Off-Reservation
Agencies or Enterprises .... _________%

MISCELLANEOUS

34. The space below is provided for you to write your comments on any issues you want to bring to our attention. Other than what has been covered above, what else do you think we should know about your program? What other suggestions or recommendations would you like to make to improve the effectiveness of the Section 401 program?

35. OPTIONAL: Please provide your name and title (your identity and all your responses will be kept strictly confidential!)

Name: ______________________________

Title: ______________________________

Thank you very much for your participation.

Your survey responses will be analyzed as part of the study of the Section 401 program being conducted by Social Policy Research Associates and American Indian Research and Development. Your responses will be held strictly confidential. Please return this completed questionnaire in the enclosed postage-paid envelope to:

Social Policy Research Associates
200 Middlefield Road, Suite 100
Menlo Park, CA 94025
Voice Telephone: 415-617-8625
Facsimile Telephone 415-617-8630

Appendix B
Client Characteristics and Outcomes, as Reported from the Annual Status Report

INA Program
National Summary and Time Trends

	PY 93	PY 94	PY 95	PY 96	PY 97
Termination Summary:					
Participants	24,924	24,425	22,461	20,245	19,752
Terminees	19,434	19,383	17,990	16,176	15,388
Job placements	10,072	9,734	9,047	8,364	8,196
Employability enhancements	9,943	9,829	8,926	8,531	7,829
Enhancements with a job	3,808	3,615	3,068	3,233	3,018
Enhancements ONLY	6,135	6,214	5,858	5,298	4,811
Positive terminations	16,207	15,948	14,905	13,662	13,007
Outcome Summary:					
Entered employment rate (%)	51.8	50.2	50.3	51.7	53.3
Enhancement rate (%)	51.2	50.7	49.6	52.7	50.9
Positive termination rate (%)	83.4	82.3	82.9	84.5	84.5
Average hourly wage of those placed in jobs[1]	$6.45	$6.53	$7.01	$7.08	$7.42
Terminee Characteristics (%):					
Dropouts	20.9	20.5	20.8	20.0	20.9
Long-term unemployed	35.7	37.0	38.9	38.7	37.4
Public assistance recipients	33.1	32.7	34.2	34.0	32.9
Multiple barriers	31.1	33.7	39.1	42.9	39.7
Cost Summary:[2]					
Total Costs (in millions)	$59.1	$60.1	$55.4	$50.5	$49.6
per terminee	$2,408	$2,452	$2,447	$2,508	$2,592
per employment	$4,646	$4,882	$4,865	$4,850	$4,867
per positive termination	$2,887	$2,980	$2,953	$2,969	$3,067
Total Number of Grantees with Data	175	171	174	164	158

NOTE: Some grantees are excluded from the calculations each year due to missing data. Additionally, grantees participating in Public Law 102-477 are exempted from DOL's reporting requirements and, therefore, are not included in these tables. Because the number of grantees participating in this program has risen each year, aggregate counts compared over time exaggerate the appearance of a downward trend.

[1] Average wages were weighted by grantee size and exclude grantees reporting values of zero.

[2] Total Expenditures represent aggregate expenditures (in actual dollars); per terminee, per employment, and per positive termination represent aggregate expenditures, less expenditures for administration and community benefit projects, divided by the aggregate counts of terminees, job placements, and positive terminations, respectively.

Appendix C
List of Abbreviations

LIST OF ABBREVIATIONS

ABE	Adult basic education
BIA	Bureau of Indian Affairs
BSCRT	Basic skills classroom training
CBP	Community benefit projects
CETA	Comprehensive Employment and Training Act
CRT	Classroom training
CSE	Community services employment
DINAP	Division of Indian and Native American Programs, DOL
DOL	U.S. Department of Labor
EEN	Employability enhancement rate
EER	Entered employment rate
GED	Graduate equivalency diploma
INA	Indian and Native American
JOBS	Job Opportunities and Basic Skills Program
JTPA	Job Training Partnership Act
OJT	On-the-job training
OSCRT	Occupational skills classroom training
PTR	Positive termination rate
PY	Program year
TA	Training assistance
TAT (TA)	Technical assistance and training
TERO	Tribal Employment Rights Office
WEX	Work experience
WIA	Workforce Investment Act